

March 2017



Matter CC8B

Emmanuel College and
Gonville and Caius College
(5289)

Rep Nos 27257, 28104,
28105

MATTER CC8B – OMISSION SITE

CAMBRIDGE TENNIS AND
HOCKEY CLUB SPO06 AND
EMMANUEL COLLEGE
PLAYING FIELD SPO16

**EMMANUEL COLLEGE AND
GONVILLE AND CAIUS
COLLEGE (5289) REP NOS
27257, 28104, 28105**

Is the Plan unsound without the inclusion of this site, and if so, why?

Yes, for the reasons given below:

1) Housing Need

Bidwells has objected to the draft plan and has submitted statements to the EIP on Housing Need over the last 3-4 years. See representation 17324 to Matter 3 and to Matter PM1A and PM1B. In 17324 to Matter 3 by robust analysis of the evidence base we demonstrated that the Cambridge City housing target for the plan period should be at least 17,950 dwellings rather than 14,000 dwellings to make the plan sound. We concluded that policies should be amended and additional housing sites identified. Similarly, we concluded that a joint trajectory is not justified where housing land supply should be addressed through the allocation of sustainable and deliverable omission sites.

2) Green Belt

The NPPF and the recent White Paper re-affirms the protection of building on Green Belt land. Local plans should allocate sites within the city area before contemplating Green Belt sites as a last resort.

3) Existing Housing Allocations

There are a number of proposed housing allocations in the city which currently have businesses/other uses on them which make them difficult to redevelop for housing as those existing businesses/uses cannot relocate to suitable sites nearby. Sites R1-R42c and Sites M1-M15. Appendix B of the draft plan contains a number of such sites. A number of these sites will not be capable of redevelopment for housing as may have appeared in previous local plans and have not been delivered. In any case, the total number of dwellings in the draft local plan will be insufficient to meet the 17950 dwellings required.

4) Sustainable Location

The omission site is enveloped on three sides by existing housing and along the southern boundary runs probably the busiest cycle route in Cambridge between University Western Campus and City Centre (see objection site plan in Appendix A) and is very close to the city centre (see Cambridge cycle map in Appendix B which shows the objection site in pink).

5) Heritage Issues

An assessment of the predicted impact of the proposed allocation on heritage assets has been undertaken and is provided in Appendix C. This assessment has been undertaken in the context of a number of publications in 2015 and 2016 of Historic England's Good Practice Advice, referenced as Core Documents in the EIP Library and published after representations were made to the draft local plan. These Advice notes set out the stages which should be applied to the consideration of proposed allocations in a heritage context. To augment the landscape and visual appraisal and associated appendices, an assessment of heritage significance and predicted impact is relevant.

The findings of the Heritage Statement are that there would be a number of designated and non-designated assets either directly or indirectly affected by new development on the site. These

include the West Cambridge Conservation Area, the setting of the Grade II listed Pavilion building and the Grade II listed 9 Wilberforce Road. There would also be potential effects on the setting of a number of non-designated heritage assets.

The outcome of the Assessment is that it is likely that there would be some harm caused to the character and appearance of the Conservation Area and the setting of the listed Pavilion as a result of development on the site as currently shown. The level of this harm varies, however. The Heritage Statement identifies that the benefit and contribution of the site's current openness is most tangible adjoining Wilberforce Road and as the immediate setting of the Pavilion, but that this level of contribution does diminish further to the west where it becomes less immediate in the townscape and within the setting of the listed building. The effect of the north-south hedgerow which divides the site also reduces the extent of the existing site's contribution to the Conservation Area as a whole and the setting of the Pavilion.

The level of harm identified to both the setting of the Pavilion and the character and appearance of the Conservation Area is considered to be "*less than substantial*" in terms of the NPPF definitions.

As a result of the analysis undertaken, it is considered that adjustment of the Concept Framework Plan in Appendix F is needed to draw the proposed development further away from the Pavilion's western elevations. This would better enable the listed building to 'command' the area of open space retained. This, in turn, would help to maintain an understanding of its original purpose and its relationship with the space.

In addition, whilst lower density development is envisaged on the eastern parts of the development area, the Heritage Statement also considers that very careful attention to the design quality of the frontages to the open space and also the landscaping to support retention of the existing 'playing field' character of the existing open land. Together, these elements would help to minimise impact on the loss of open setting.

The Heritage Statement also notes that an essential element of the development would also be the identification and provision of a suitable and optimum viable use for the Pavilion in the event that its current purpose ceases.

6) Protected Open Space (Policy 67)

Bidwells objected to Policy 67 (rep no 27254), submitted a statement and appeared at the EIP on Matter CC1B. Our submissions demonstrated that the designation of sites SPO06 and SPO16 as protected open space is unjustified and unnecessary. We suggested amendment to the wording of Policy 67 that the draft policy was too onerous in relation to the criteria to the proximity requirement for replacement open space. We stated that the policy would meet the requirements of paragraph 74 of the NPPF if it were reworded to 'the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a sustainable location'. The 400m distance required by the draft policy is onerous and impractical in Cambridge.

To this end, Bidwells applied for change of use of agricultural land to playing field on behalf of the objector on land adjacent Rutherford Road, off Long Road, Cambridge, in 2008 (LPA ref 08/0873/FUL) approved 18 August 2008 (see Decision Notice and location plan in Appendix D). This site is also shown in orange in Appendix B to show its relationship to the cycle network in Cambridge. The change of use was implemented on 17 August 2011 by documentary evidence from the City Council. The replacement playing field is 7.016ha. Along the eastern boundary runs to Cambridge Guided Bus route and main cycle route between the city centre and Trumpington. The Hobson's Brook footpath runs along the western boundary. Clare College

playing field is beyond the northern boundary and Long Road with vehicular access to the site is along the southern boundary. This playing field is larger in size than the omission site which is 6.6ha. Thus, the new playing field off Long Road is approx. 0.4ha larger than the omission site, a net increase in open space for the city.

On 21 November 2012, planning permission was given for the erection of a sports pavilion, machinery store and car park at the Long Road playing field under LPA reference 11/0818/REM (see Decision Notice and approved drawing in Appendix E).

The Omission Site

It is important to state that a Hockey Club has not operated on the site SP006 since 2003 as grass pitches are no longer used as artificial pitches are preferred. The previous pitch of approx. 1.25ha has not been used for any sport for 14 years.

For local plan purposes, we have provided appropriate and proportionate evidence in our original objections and subsequent statements to the EIP on the draft policies relevant to the omission site. These include:-

- Site Appraisal (drainage, flood risk and highways)
- Ecology Report
- Landscape and Visual Appraisal
- Response to Core Library Documents – published after submission of local plan on Heritage (Appendix C of this document)

There are no overriding site specific issues arising out of our investigation which would suggest that the omission site could not be developed for housing and provide new public open space.

If the Inspector recommends the omission site for housing allocation, the objectors will work with the City Council through the pre-application and consultation process. A Section 106 agreement would control any planning obligations relating to relocation of appropriate facilities down to the Long Road playing field.

Within the Landscape and Visual Appraisal submitted with our original objections 27527, 28104 and 28105 is contained in Appendix 3 of that document an 'opportunities and constraints plan' and 'concept framework plan' shows how a housing and public open space proposal may be planned. Of course, detailed, pre-application discussion will need to commence with the City Council following allocation of the site in the adopted plan. There is the potential consideration that an area of approx. 1.15ha of public open space along the Wilberforce Road frontage would be appropriate for use and setting purposes to be used by existing and proposed occupiers. I include the two plans in Appendix F of this statement for ease of reference.

Housing and Open Space Allocation

Responding to site context and surrounding built form of traditional family size dwellings, our concept framework plan provides a general guide for development and open space areas (approx. as follows):-

Site Area	6.6ha
Formal POS	1.15ha
Amenity space/landscaping	1.65ha

Developable Area

3.7ha

The proposal would be to provide for mixed family scale housing appropriate to the area to reflect context, of approx 75-80 dwellings (for local plan purposes) which would include 40% affordable housing on site ie 48 market and 32 affordable (approx 21 dph) to reflect the density of development in the area and which would respect the conservation area status by allowing a large area of public open space fronting Wilberforce Road.

Changes required to the draft local plan to make it sound

The evidence set out in our objections, supporting evidence reports, and subsequent statements including this Statement and Appendices demonstrates that the draft plan is currently unsound.

Paragraph 182 of the NPPF requires local plans to be:-

- Positively prepared to meet objectively assessed development and consistent with achieving sustainable development;
- Justified where the plan should be the most appropriate strategy when considered against reasonable alternatives based on proportionate evidence;
- Consistent with national policy delivering sustainable development in according with policies in the NPPF.

The omission site should be allocated for housing within Appendix B of the plan – proposals schedule as 'R46' or appropriate reference 'Land off Wilberforce Road', area 6.6ha with capacity for approx. 75-80 dwellings and public open space. Similarly, changes need to be made to include the housing allocation on the proposals map.

For the reasons given above, reference to sites SPO06 and SPO16 should be removed from Appendix C of the draft local plan (page 273) as suitable replacement facilities and open space will be provided off Long Road. The housing development would not commence on the Wilberforce Road site until the replacement facilities are ready for use at Long Road to seek to ensure that there is no discontinuation of recreational use (to be controlled by a Section 106 agreement).

APPENDIX A
OMISSION SITE

Land West of Wilberforce Road, Cambridge



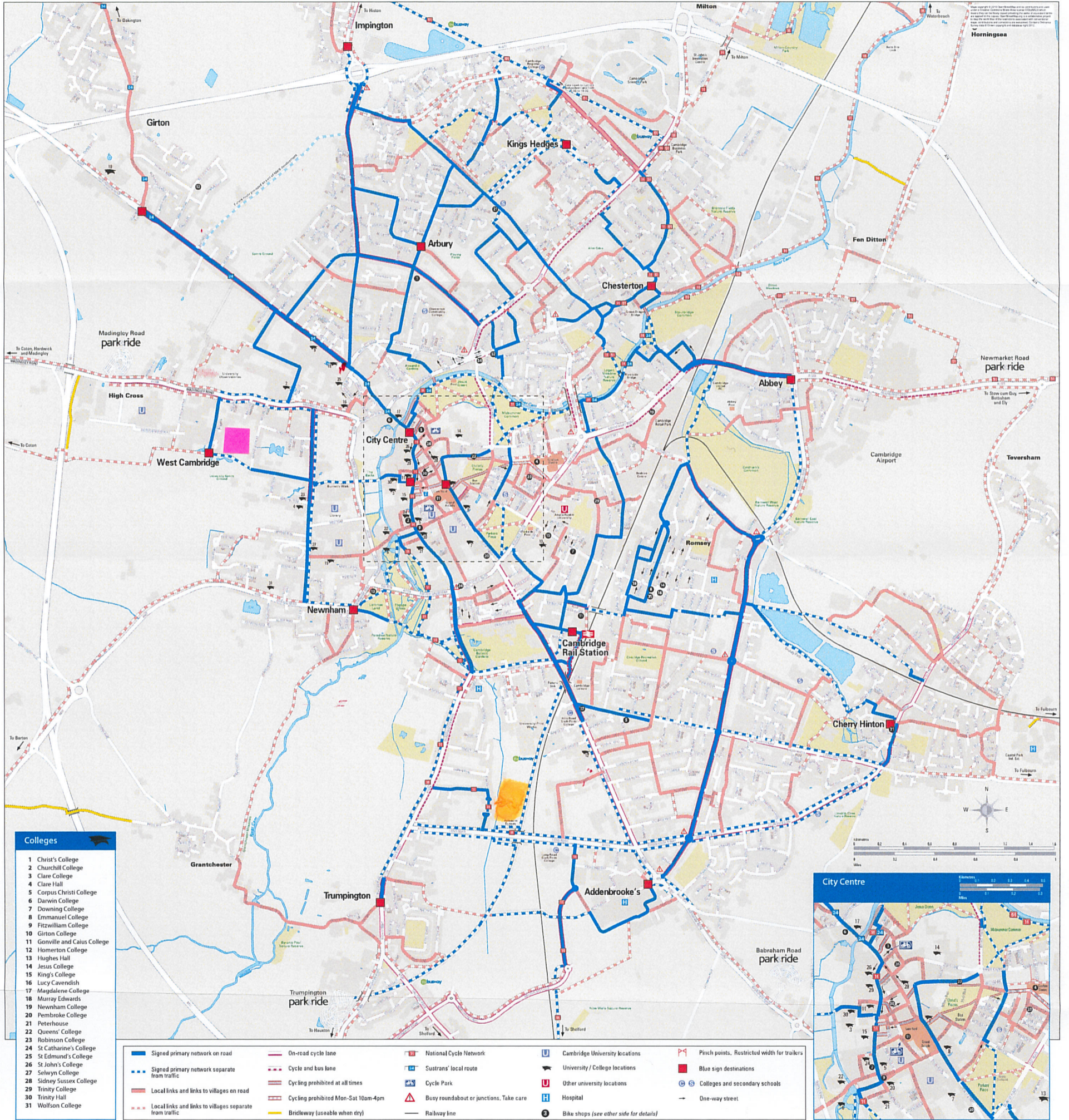
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Drawing Number : A.32.061/a
O.S. Ref : TL 4358 NW
Date : 4/6/2008

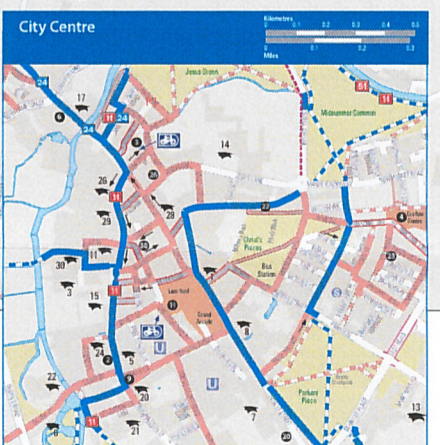
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APPENDIX B
CAMBRIDGE CYCLE MAP



- Colleges**
- 1 Christ's College
 - 2 Churchill College
 - 3 Clare College
 - 4 Clare Hall
 - 5 Corpus Christi College
 - 6 Darwin College
 - 7 Downing College
 - 8 Emmanuel College
 - 9 Fitzwilliam College
 - 10 Girton College
 - 11 Gonville and Caius College
 - 12 Homerton College
 - 13 Hughes Hall
 - 14 Jesus College
 - 15 King's College
 - 16 Lucy Cavendish
 - 17 Magdalene College
 - 18 Murray Edwards
 - 19 Newnham College
 - 20 Pembroke College
 - 21 Peterhouse
 - 22 Queens' College
 - 23 Robinson College
 - 24 St Catharine's College
 - 25 St Edmund's College
 - 26 St John's College
 - 27 Selwyn College
 - 28 Sidney Sussex College
 - 29 Trinity College
 - 30 Trinity Hall
 - 31 Wolfson College

- Signed primary network on road
 - - - Signed primary network separate from traffic
 - Local links and links to villages on road
 - - - Local links and links to villages separate from traffic
- On-road cycle lane
 - - - Cycle and bus lane
 - - - Cycling prohibited at all times
 - - - Cycling prohibited Mon-Sat 10am-4pm
 - Bridleway (useable when dry)
- National Cycle Network
 - - - Sustrans' local route
 - Ⓜ Cycle Park
 - ⚠ Busy roundabout or junctions. Take care
 - Railway line
- U Cambridge University locations
 - U University / College locations
 - U Other university locations
 - H Hospital
 - Ⓜ Bike shops (see other side for details)
- ⚠ Pinch points. Restricted width for trailers
 - Blue sign destinations
 - Ⓜ Colleges and secondary schools
 - One-way street



APPENDIX C
HERITAGE STATEMENT



HERITAGE STATEMENT

LAND TO WEST OF WILBERFORCE ROAD, CAMBRIDGE

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Quality Assurance

Site name: **Land to west of Wilberforce Road, Cambridge**

Client name: **Emmanuel and Gonville & Caius Colleges**

Type of report: **Heritage Statement**

Prepared by: **Kate Hannelly BSc(Hons) MSc**

Signed: 

Date: **09 March 2017**

Reviewed by: **Chris Surfleet MA MSc PGDipUD IHBC**

Signed 

Date **10 March 2017**



1.0 Introduction

- 1.1 This Heritage Assessment has been prepared on behalf of Emmanuel and Gonville & Caius Colleges to assess the impact on heritage assets of the proposed allocation of land to the west of Wilberforce Road for residential development. The site is located approximately 1.5km to the west of Cambridge City Centre and 200m to the south of Madingley Road (A1303).
- 1.2 The site is bordered by the residential streets of Bulstrode Gardens and Hedgerley Close to the north, by Wilberforce Road to the east, by Stacey Road and University Sports Grounds to the south and by the residential streets of Perry Court and The Lawns to the west. The site is located within the West Cambridge Conservation Area. Development of the site may affect the setting of two grade II listed buildings; Emmanuel College Sports Pavilion (including Groundsman's House and stable) and No. 9 Wilberforce Road.



Figure 1 – Indicative site location of land to west of Wilberforce Road

- 1.3 This Heritage Statement includes a Significance Assessment which identifies the relative heritage value of the identified heritage assets and an Impact Assessment which considers the potential impact of residential development on the significance of the heritage assets identified, including the contribution made by their settings. This approach to impact-assessment is required in order to satisfy the provisions of Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on a heritage asset is being considered (Paragraphs 128-135).
- 1.4 In addition, this document considers how residential development on the site could be brought forward in a manner which minimises impacts on heritage assets and their settings.
- 1.5 This approach to early assessment of impacts is consistent with the guidance offered in the Historic England's Advice Note 'The Historic Environment and Site Allocations in Local Plans' which was published in October 2015, included Appendix 1 of this document.
- 1.6 The document has been prepared by Kate Hannelly BSc(Hons) MSc (Principal, Heritage & Design) and Chris Surfleet MA MSc PGDipUD IHBC (Head of Heritage).

2.0 Heritage Policy and Guidance Summary

Legislation

2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.

- Section 66(1) reads: *“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.”*
- In relation to development within Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

National Planning Policy Framework

2.2 The National Planning Policy Framework (NPPF) was published on 27th March 2012. The over-arching aim of the heritage policy, expressed in the Ministerial foreword, is that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”*

2.3 Paragraph 126 clarifies that heritage assets are “an irreplaceable resource” and that Local Planning Authorities should seek to “conserve them in a manner appropriate to their significance”.

2.4 The same paragraph is specific as to the considerations applicable to heritage assets and their value to wider society:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development 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.*

2.5 Particularly relevant in this instance is the aspiration to sustain significance where it is found, particularly where contributing to local character and identity, and the importance of identifying new uses.

2.5 As a context for decision-making, the NPPF directs local planning authorities to require an applicant to *“describe the significance of any heritage assets affected, including any contribution*



made by their setting” and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 128). This gives rise to the need for a Significance Assessment which identifies and then sets out the relative nature and value of affected heritage assets. It also stresses the importance of proportionality both in the extent to which assessments are carried out and in the recognising the relative merits of the assets.

2.6 Planning Authorities should then *“take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid conflict between the heritage asset’s conservation and any aspect of the proposal”* (Paragraph 129). This paragraph results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.

2.7 Paragraph 132 of the NPPF states that *“Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.”* Equally, significance can be reduced or lost if a heritage asset lies out of use or is otherwise at risk.

2.8 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 133 states the following:

“Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.”*

2.9 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in *“less than substantial harm”*, paragraph 134 provides the following:

“Where a development proposal will lead to 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.”

2.10 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

2.11 In the case of non-designated heritage assets Paragraph 135 requires a Local Planning Authority to make a *“balanced judgement”* having regard to the scale of any harm or loss and the significance of the heritage asset. In this context, the lack of a viable use for the historic farmstead is likely to result in the loss of its significance, as there will be insufficient purpose to encourage their retention.

2.12 The preparation of this document is therefore intended to identify the overall significance of the farmstead, and how that significance might be sustained through the identification of a viable use which can bring about its retention, repair and restoration for the future.

National Planning Practice Guidance (NPPG)

- 2.13 The Planning Practice Guidance (PPG) was published in March 2014 as a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance. In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted. The PPG also notes the following in relation to the setting of heritage asset: “A *thorough* assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.” (Ref ID: 18a-014-20140306)
- 2.14 This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a “*high test*”.

English Heritage ‘Conservation Principles: Policies and Guidance’ 2008.



- 2.15 Historic England (formerly English Heritage) sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment. It provides a framework of assessment principles to help provide a sustainable management plan for the historic environment.
- 2.16 Of the six over-arching principles of the document, one is that ‘Understanding the significance of places is vital’ and another is that ‘*Significant places should be managed to sustain their values.*’
- 2.17 Principle 4 of the document, ‘**Significant places should be managed to sustain their values**’ highlights that: “*Conservation is the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.*”

Historic England Conservation Area Designation, Appraisal and Management Advice Note 1 (February 2016)

- 2.18 This document sets out the guidance on how to manage change in a way which conserves and enhances historic areas. It highlights that “*change is inevitable, however, not necessarily harmful and often beneficial*”. It goes on to advise that “*work in designating, appraising and managing conservation areas should be no more than is necessary, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets.*”

Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

- 2.19 This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that "*The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting.*" (page 10)

Historic England The Historic Environment and Site Allocations in Local Plan Advice Note 3 (October 2015)

- 2.20 This advice note provides information on evidence gathering and site allocation policies to ensure that that heritage considerations are fully integrated into site allocation processes. It provides a site selection methodology in stepped stages:

“STEP 1 Identify which heritage assets are affected by the potential site allocation

- *Informed by the evidence base, local heritage expertise and, where needed, site surveys*
- *Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases Heritage assets that lie outside of these areas may also need identifying and careful consideration.*

STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:

- *Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)*
- *Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)*
- *Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information*
- *For a number of assets, it may be that a site makes very little or no contribution to significance.*

STEP 3 Identify what impact the allocation might have on that significance, considering:

- *Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views*
- *Form and appearance of development e.g. prominence, scale and massing, materials, movement*
- *Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use*
- *Secondary effects e.g. increased traffic movement through historic town centres as a result of new development*

STEP 4 Consider maximising enhancements and avoiding harm through:

Maximising Enhancement

- *Public access and interpretation*
- *Increasing understanding through research and recording*
- *Repair/regeneration of heritage assets*
- *Removal from Heritage at Risk Register*
- *Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design*

Avoiding Harm

- *Identifying reasonable alternative sites*
- *Amendments to site boundary, quantum of development and types of development*
- *Relocating development within the site*
- *Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings*
- *Addressing infrastructure issues such as traffic management*

STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness

- *Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)*
- *Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence*
- *Effective in terms of deliverability, so that enhancement is maximised and harm minimised*
- *Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance*

Decisions should be clearly stated and evidenced within the Local Plan, particularly where site allocations are put forward where some degree of harm cannot be avoided, and be consistent with legislative requirement.”

Historic England The Historic Environment in Local Plans Historic Environment Good Practice Advice (GPA) in Planning Note 1 (March 2015)

- 2.21 This advice note “*emphasises that all information requirements and assessment work in support of plan-making and heritage protection needs to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time, those taking decisions need sufficient information to understand the issues and formulate balanced policies*” (Page 1).

Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

- 2.22 This advice note, 'Managing Significance in Decision-Taking in the Historic Environment', sets out clear information to assist all relevant stake holders in implementing historic environment policy in

the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG).

2.23 These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.”* (page 1)

2.24 The spirit of this statement is therefore consistent with the thread of policies from the top level of the NPPF: in other words, that significance should be sustained, and that policies and approaches should be imaginative and flexible to enable conservation of heritage significance.

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning Note 3 (March 2015)

2.25 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: *‘A staged approach to proportionate decision taking’* provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

- *“Step 1 - identify which heritage assets and their settings are affected;*
- *Step 2 - assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);*
- *Step 3 - assess the effects of the proposed development, whether beneficial or harmful, on that significance;*
- *Step 4 - explore the way maximizing enhancement and avoiding or minimizing harm;*
- *Step 5 - make and document the decision and monitor outcomes.”*

Historic England Seeing the History in the View (June 2012)

2.26 This document explains how the heritage significance of views can be assessed in a systematic and consistent way. It highlights a ten-step process, split into two phases, to identify and assess the significance and impact on specific and formal views.

Phase A:

- Step 1 – Establishing reasons for identifying a particular view as important;
- Step 2 – Identifying which heritage assets in a view merit consideration;
- Step 3 – Assessing the significance of individual heritage assets;
- Step 4 – Assessing the overall heritage significance in a view;
- Step 5 – How can heritage significance be sustained

Phase B:

- Step 6 – Identifying the importance of the assets and the view
- Step 7 - Assessing the magnitude of impact on individual heritage assets
- Step 8 - Assessing the magnitude of the cumulative impact of proposals on heritage

- Step 9 – Determining the overall impact
- Step 10 – identifying ways of mitigating the impact of development.

Local Policy

The Cambridge Local Plan

- 2.27 The Cambridge Local Plan sets out the planning framework to guide future development in Cambridge up to 2031 and will form part of the development framework. The Local Plan has been submitted to the Secretary of State for consideration and is currently under Examination. This document is presented as an appendix to the objector's statement to the EIA.

The Cambridge Local Plan 2006

- 2.28 The Cambridge Local Plan 2006 was formally adopted on 20th July 2006. In 2009, the Secretary of State issued a formal direction on 2 July saving the majority of policies. The policies which related to the application site in terms of built heritage and design are 4/10, 4/11 and 4/12.
- 2.29 In relation to built heritage Policy 4/10 Listed Buildings states that "*Development affecting Listed Buildings and their settings, including changes of use, will not be permitted unless:*
- it is demonstrated that there is a clear understanding of the building's importance in the national and Cambridge context including an assessment of which external and internal features and aspects of its setting are important to the building's special interest; and*
 - the proposed works will not harm any aspects of the building's special interest or the impacts can be mitigated to an acceptable level for example by being easily reversible; or*
 - where there will be an impact on the building's special interest, this is the least damaging of the potential options and there are clear benefits for the structure, interest or use of the building or a wider public benefit; and*
 - features being altered will be reused and/or properly recorded prior to alteration."*
- 2.30 In relation to Conservation Areas Policy 4/11 Conservation Areas states that "*Developments within, or which affect the setting of or impact on views into and out of Conservation Areas, will only be permitted if:*
- they retain buildings, spaces, gardens, trees, hedges, boundaries and other site features which contribute positively to the character or appearance of the area;*
 - the design of any new building or the alteration of an existing one preserves or enhances the character or appearance of the Conservation Area by faithfully reflecting its context or providing a successful contrast with it; and*
 - a new or intensified use will not lead to traffic generation or other impacts which would adversely affect the Area's character"*
- 2.31 Policy 4/12 Buildings of Local Interest highlights that "*Although not statutorily listed, Buildings of Local Interest merit protection from development which adversely affects them. The demolition of such a building will only be permitted if the building is demonstrably incapable of beneficial use or reuse or there are clear public benefits arising from redevelopment. Applications for planning*

permission to alter such buildings will be considered in the light of the Council's approved Guidance on Alterations and Improvements to Buildings of Local Interest."

West Cambridge Conservation Area Appraisal

- 2.32 The West Cambridge Conservation Area Appraisal is a document which seeks to define the special interest of the area. The document was subject to public consultation and approved in March 2011 and is now a material consideration for applications for development both within the boundaries of the Conservation Area as well as in its setting.

3.0 Methodology

- 3.1 A heritage asset is defined within the NPPF as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).” (NPPF Annex 2: Glossary)
- 3.2 The significance of the heritage assets within the proposed site require assessment in order to provide a context for, and to determine the impact of, current development proposals. Significance is defined as “the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (NPPF Annex 2: Glossary).
- 3.3 The aim of this Heritage Statement is to identify and assess any impacts that the proposed development may cause to the value or significance of the identified heritage assets and/or their settings. Impact on that value or significance is determined by considering the sensitivity of the receptors identified and the magnitude of change.
- 3.4 Table 1 sets out thresholds of significance which reflect the hierarchy for national and local designations, based on established criteria for those designations. The Table provides a general framework for assessing levels of significance, but it does not seek to measure all aspects for which an asset may be valued – which may be judged by other aspects of merit, discussed in paragraphs 3.5 onwards.

Table 1 – Assessing heritage significance

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings and Scheduled Monuments of exceptional quality, or assets of acknowledged international importance or can contribute to international research objectives. Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes of international sensitivity.
High	Grade I, Grade II* and Grade II Listed Buildings and built heritage of exceptional quality. Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes which are extremely well preserved with exceptional coherence, integrity, time-depth, or other critical factor(s).
Good	Scheduled Monuments, or assets of national quality and importance, or that can contribute to national research objectives. Grade II* and Grade II Listed Buildings, Conservation Areas with very strong character and integrity, other built heritage that can be shown to have exceptional qualities in their fabric or historical association. Grade II* and II Registered Parks and Gardens, Registered Battlefields and historic landscapes and townscapes of outstanding interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).

Medium/ Moderate	Grade II Listed Buildings, Conservation Areas, locally listed buildings and undesignated assets that can be shown to have good qualities in their fabric or historical association. Grade II Registered Parks and Gardens, Registered Battlefields, undesignated special historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Assets compromised by poor preservation and/or poor survival of contextual associations but with potential to contribute to local research objectives. Historic buildings or structures of modest quality in their fabric or historical association. Locally-listed buildings and undesignated assets of moderate/ low quality. Historic landscapes and townscapes with limited sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible/ none	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

3.5 Beyond the criteria applied for national designation, the concept of value can extend more broadly to include an understanding of the heritage values a building or place may hold for its owners, the local community or other interest groups. These aspects of value do not readily fall into the criteria typically applied for designation and require a broader assessment of how a place may hold significance. In seeking to prompt broader assessments of value, Historic England's Conservation Principles categorises the potential areas of significance (including and beyond designated assets) under the following headings:

Evidential value – *'derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.'* (Conservation Principles page 28)

3.6 Evidential value therefore relates to the physical remains of a building/structure and its setting, including the potential for below ground remains, and what this primary source of evidence can tell us about the past.

Aesthetic Value – *'Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive'* (pages 30-31).

3.7 Aesthetic value therefore relates to the visual qualities and characteristics of an asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric, and setting (including public and private views).

Historic Value – *'derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished*

by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value' (pages 28-30).

- 3.8 Historic value therefore relates to the age and history of the asset, its development over time and the strength of its tie to a particular architectural period, person, place or event. It can also include the layout of a site, the plan form of a building and any features of special interest.

Communal Value – *“Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them... They may relate to an activity that is associated with the place, rather than with its physical fabric... Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there” (pages 31-32).*

- 3.9 Communal value therefore relates to the role an asset plays in a historic setting, village, town or landscape context, and what it means to that place or that community. It is also linked to the use of a building, which is perhaps tied to a local industry or its social and/or spiritual connections.

- 3.10 Historic England's Conservation Principles also considers the contribution made by setting and context to the significance of a heritage asset.

- *“‘Setting’ is an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”*
- *“‘Context’ embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places” (page 39).*

- 3.11 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations, but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.

- 3.12 Once the value and significance of an asset has been assessed, the next stage is to determine the ‘magnitude’ of the impact brought about by the development proposals. This impact could be a direct physical impact on the assets itself or an impact on its wider setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting being considered as the asset itself.

3.13 Table 2 sets out the levels of impact that may occur and to what degree their impacts may be considered to be adverse or beneficial in effect.

Table 2: Assessing magnitude of impact

Magnitude of Impact	Typical Criteria Descriptors
Very High	<p>Adverse: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.</p>
High	<p>Adverse: Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>
Medium	<p>Adverse: Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p>Beneficial: Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
Minor/Low	<p>Adverse: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p>Beneficial: Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
Negligible	Barely discernible change in baseline conditions
Nil	No discernible change in baseline conditions.

4.0 Historic Context

- 4.1 One of the earliest Ordnance Survey maps to show the site adjoining Wilberforce Road is the 1888 Ordnance Survey Map. This map shows the site as two separate open fields bounded by trees. A footpath is shown to run across the southern half of the eastern field.
- 4.2 The surrounding area is predominantly agricultural at this date with no built form in the immediate vicinity. This is with the exception of Grange Farm to the south of the site.
- 4.3 The 1904 Ordnance Survey Map shows the site as remaining in agricultural use. At this time, development can be seen to the east and south-east of the site, along the newly formed Adams Road, Sylvester Road and Herschel Road. Grange Road is shown as partially constructed.
- 4.4 The land, on which the proposed site is located, was sold by Trinity College to Emmanuel College in 1907.

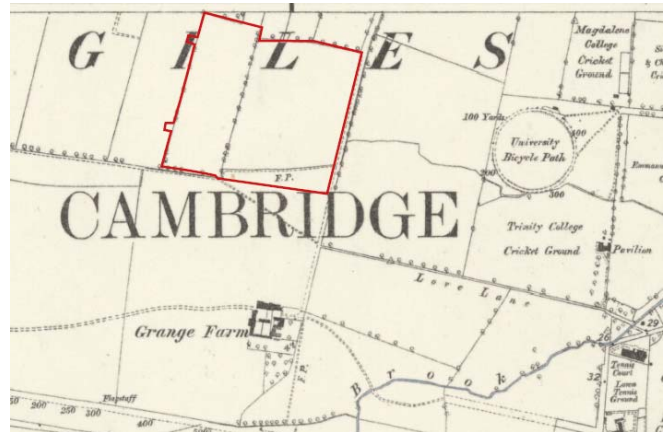


Figure 2 - 1888 Ordnance Survey map

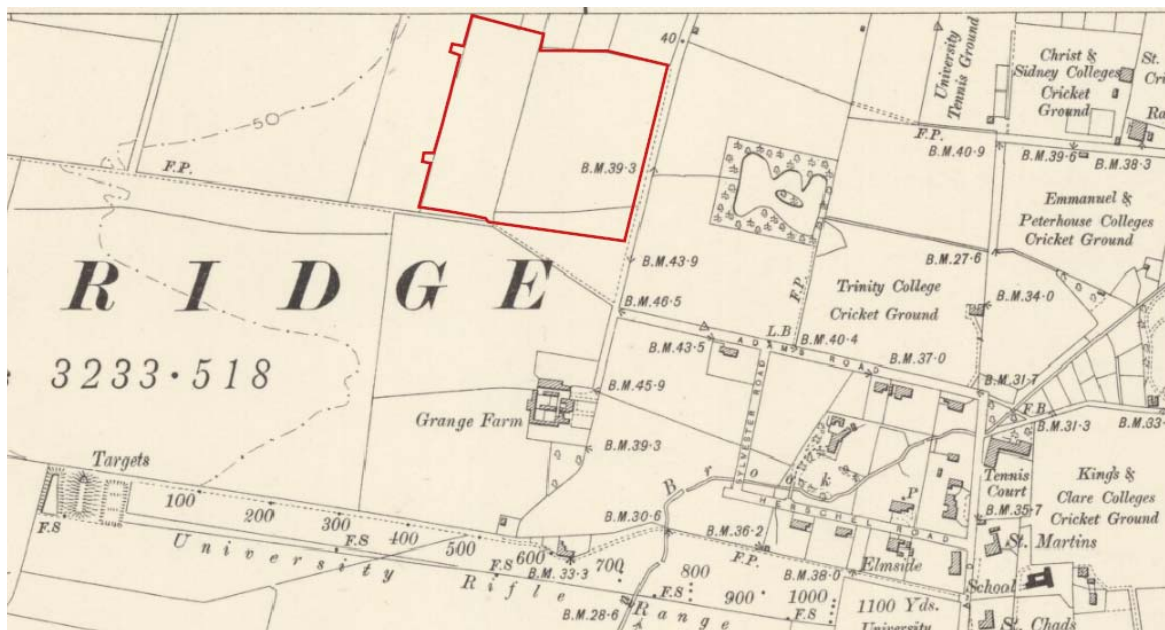


Figure 4 – 1904 Ordnance Survey Map showing the site remaining as an undeveloped field.

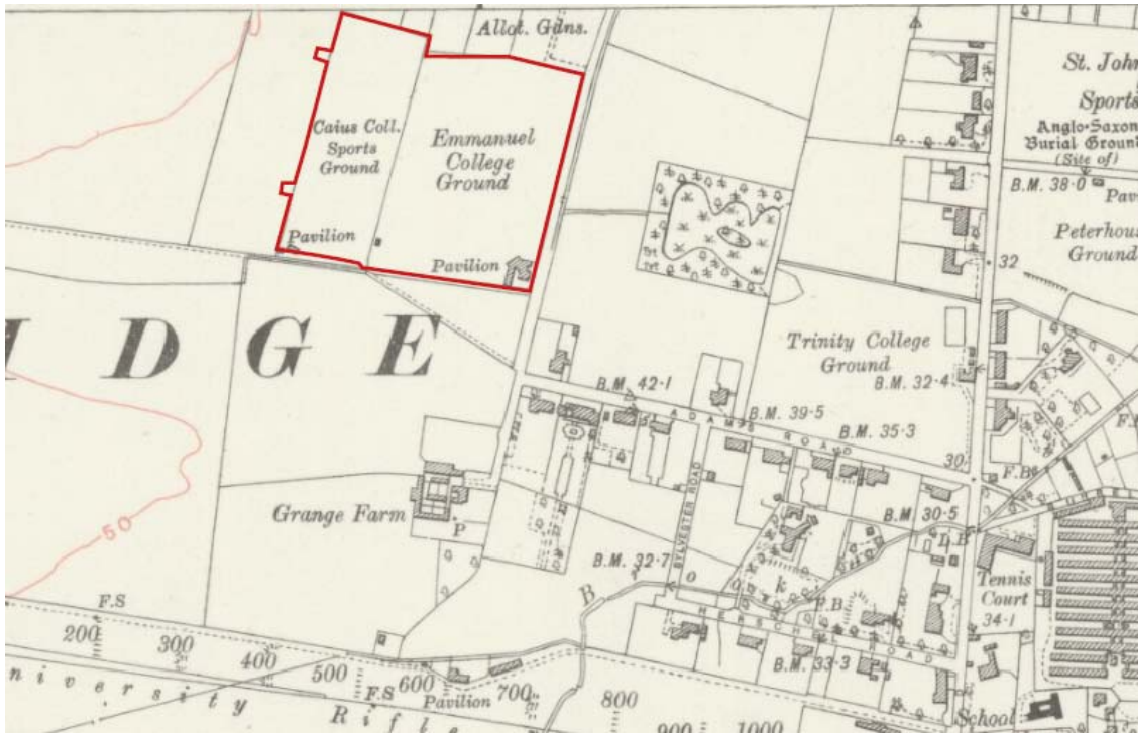


Figure 3 - 1927 Ordnance Survey map

- 4.5 By 1927, the sport grounds had been laid out with the Pavilion and Groundsman's House located in the south-eastern corner. At this point, the site was split between Caius and Emmanuel Colleges, with Caius constructing their own pavilion to the south-west of the Gonville & Caius College Sports Ground. There is limited, to no, built form in proximity to the site, although development to the west side of Adams Road can now be seen. Grange Road has also been completed by this time, with built form along its length.
- 4.6 The 1946 Ordnance survey Map shows the beginning of development along Wilberforce Road and the creation of Clarkson Road, which connected with Grange Road in the east. By 1952, further development of the area is evident with the plots along Bulstrode Gardens seen to the north of the site.

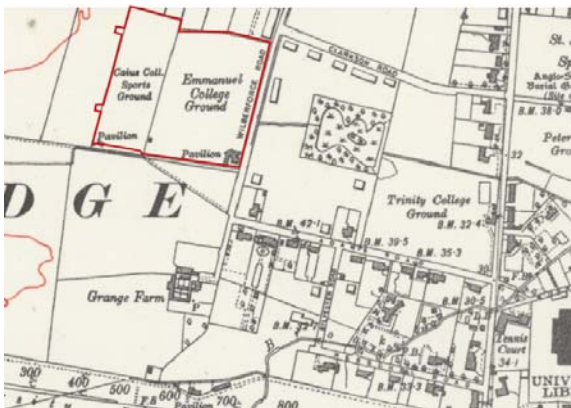


Figure 5 - 1946 Ordnance Survey Map

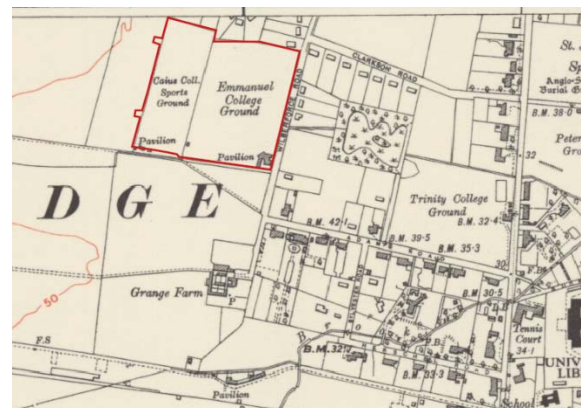


Figure 4 – 1952 Ordnance Survey Map

5.0 Heritage Assets

- 5.1 This section identifies heritage assets which have a relationship with the development site. In the case of this application, the following designated heritage assets are local to the proposed development and have been identified as they may be affected by the current proposals. The identification of these assets is consistent with '**Step 1**' of the GPA3 The Setting of Heritage Assets.
- 5.2 Although there are numerous assets within the local surrounding area, the location and significance of many of them results in them having no perceptible relationship with the proposed development. For this reason, only the heritage assets which may be considered to be affected by the proposed development have been highlighted. All relevant Statutory List descriptions can be found in **Appendix 2**.
- 5.3 In the case of this application, the following designated and non-designated heritage assets may be affected by the current proposals:
- West Cambridge Conservation Area;
 - Emmanuel College Sports Pavilion, including Groundsman's House and stable – Grade II;
 - 9 Wilberforce Road – Grade II;
 - 19 Wilberforce Road – Building of Local interest;
 - Nos 6 – 11 Bulstrode Gardens – Positive Unlisted Buildings;
 - Nos 4 and 5 Hedgerley Close – Positive Unlisted Buildings.
- 5.4 There are no Registered Park and Gardens affected by the proposed development.



Figure 6 - Location map showing site boundary and adjacent heritage assets

6.0 Designated Heritage Assets

West Cambridge Conservation Area

- 6.1 The West Cambridge Conservation Area was originally designated in March 1972 and extended in December 1984 and March 2011. The Conservation Area is focussed along Grange Road which runs north-south and is bounded by Madingley Road to the north and Barton Road to the south.

Evidential Value

- 6.2 Until the mid to late 19th century, much of the area was used for agricultural purposes, with only a small amount of built form seen. The growing need for new Colleges and accommodation lead to the rapid growth of the area in the late 19th century. The Conservation Area today, consists mainly of residential streets with large, mainly detached, properties along them which date to the late 19th or early 20th centuries. During the mid-20th century, a number of University buildings were constructed on the Sidgwick Site with further buildings constructed along Grange Road and Wilberforce Road.
- 6.3 Due to the retention of the 19th and early 20th century buildings and street layout the evidential value of the Conservation Area is considered to be **good**.

Aesthetic Value

- 6.4 The Conservation Area is a mix of late 19th/ early 20th century residential houses and 19th and 20th century educational buildings. The residential properties are predominantly of an Arts & Crafts aesthetic with Queen Anne Revival, Modern Movement and neo Georgian buildings also present.
- 6.5 A large number of open spaces, many of them used as sports fields, as well as hedges and mature vegetation are also found within the Conservation Area. These spaces contribute to the setting of the built form and to the character and appearance of the area as a whole.
- 6.6 As a result of the 19th and 20th centuries buildings coupled with the green spaces and mature vegetation scattered throughout the area, the aesthetic value of the Conservation Area is considered to be **good**.

Historic Value

- 6.7 The Conservation Areas was historically in agricultural use with one of the first non-agricultural buildings being constructed was the University Observatory in 1822/23. The development of the former medieval West Fields began around 1870. This land, covering approximately 200 acres, was owned primarily by the colleges which had historically resisted any construction. However, as a result of the loss of college revenue from the agricultural depression, the colleges began to lease the land for building. Large dwelling houses, in various styles, were built piecemeal over the next half a century. The demand for such houses was partly fuelled by a new statute passed in 1882 that allowed dons to marry without having to give up their fellowships.
- 6.8 There was not a specified layout and design of plots but the landowners restricted the type of buildings which could be developed. They achieved this by issuing leases that specified minimum plot sizes, minimum house costs, specification of superior building materials and had stringent

clauses to ensure that property did not deteriorate. The historic value of the Conservation Area is therefore considered to be **good**.

Communal Value

- 6.9 The Conservation Area has a **good** level of communal value due to its use for residential and educational purposes and its connection with the Cambridge Colleges and University. The area also has a strong image.

Contribution of the Emmanuel Sports Ground to the significance of the Conservation Area

- 6.10 The proposed allocation site is located to the west of the West Cambridge Conservation Area, to the west of Wilberforce Road. As shown within the historic mapping in Section 4, this piece of land formed part of historic agricultural land to the west of Cambridge. These maps show that site was not formally laid out as sport grounds until the 1920s, when piecemeal development began to be seen within this former agricultural land.
- 6.11 When considering the site within the context of the wider Conservation Area, it is important to consider the history and function of the land as well as views in, out and through the site. It is also important to consider the contribution that this area makes to the setting of the adjacent built form.
- 6.12 As previously discussed, the land formed part of an agricultural field system to the west of Cambridge. This was until it was turned into a Sports Ground in the early 20th century. Today, the site retains this use with a cricket pitch and tennis courts marked out (on both soft and hard courts) across the site. The northern element of the Gonville & Caius ground appears to be an area of mown grass rather than formal Sports Ground, but it is understood that this was historically used as hockey pitches until 2003. The site is bounded by built form to the north, east and west and by the University Sports Ground and Green Belt to the south.



Figure 7 - Aerial view of Sports Ground

- 6.13 The Conservation Area Appraisal highlights both elements of the sports grounds (Emmanuel and Gonville & Caius) as areas of *'protected open space'* with a row of important trees/ tree groups separating the two sides. The appraisal also highlights two important positive views, looking east from this line of important trees. These views across the sport grounds do not, however, give any meaningful glimpses into the City Centre or its skyline, but do provide a view of the built form along Wilberforce Road.
- 6.14 Currently, these views across the site are only available as private views, as there are no public vantage points within the site. Although these views are highlighted as important within the appraisal, the value of these views is considered to be restricted to their immediate context rather than being public or specific long distance vistas.
- 6.15 When considering views towards and through the site from Wilberforce Road, it is evident that the site provides a visual break within the built form. However, when looking south along Wilberforce Road the open nature of the sport grounds is less defined due to the established character of the built form and the established mature vegetation within their plots.
- 6.16 The large mature trees and hedgerows create a leafy character to the immediate roadside. As a result of the set back of the built form along the streetscape, the perceived bulk and enclosure that this would usually provide is not apparent. It is in fact the boundary walls and hedges which focus views along the streetscape towards the Pavilion. When viewing the site from this vantage point, the open nature of the Sports Ground is not immediately evident, but the leafy more suburban appearance of the area is apparent.



Figure 8 - View south along Wilberforce Road.

- 6.17 Views north along Wilberforce Road are generally open in character, mainly as a result of the presence of an open grassed area to the immediate south of the sport grounds and the University Sports Ground beyond. However, the presence of mature trees reduces direct views of the open grounds with views beginning to open out once you are in closer proximity to the Pavilion.
- 6.18 Once past the built form of the Pavilion, the open nature of the Sports Ground is more evident. The views gained westwards across the site are of 20th and 21st century properties which are of no value historically. The Gonville & Caius Sports Ground is less evident in these views due to the intersection of a hedgerow and large mature trees. This intersection creates a clear separation between the two parts of the site and emphasises that the level of appreciation of the site's openness diminishes westwards.



Figure 11 – View north along Wilberforce road



Figure 10 - View north from adjacent the Pavilion



Figure 9 – View of Sports Ground looking north-west from centre of Wilberforce Road

- 6.19 In considering these viewpoints, it is evident that the site forms a break in the built form and provides an area of open space for its immediate context. It is clear that the contribution of the site's current openness is most tangible adjoining Wilberforce Road and in particular the immediate setting of the Pavilion, but that this level of contribution does diminish further to the west where it becomes less immediate in the townscape and within the setting of the listed building. The buildings which are located on the eastern side of Wilberforce Road, whose principal facades face directly onto the Sports Ground, also benefit from the open space contributing to their extended settings although this contribution is again most evident immediately adjacent the Wilberforce Road and reducing in importance to the west. The effect of the north-south hedgerow which divides the site also reduces the extent of the existing site's contribution to the Conservation Area as a whole, and the setting of the Pavilion and other built form along Wilberforce Road.
- 6.20 The contribution of the Sports Ground to the wider function, understanding and overall character and appearance of the Conservation Area is therefore considered to be **good** in nature

Emmanuel College Sports Pavilion

- 6.21 The Sports Pavilion, with attached Groundsman's house and stable, is located to the south-east of the Emmanuel College Sports Ground. It was built for Emmanuel College in 1910 and was added to the Statutory List of Buildings of Architectural or Historic value in 2014.



Figure 12 - Sports Pavilion

Evidential Value

- 6.22 The building is an early 20th century structure which retains many of its original fixtures and fittings. Although the stable doors have been lost, its former use is clear and the buildings represent a complete depiction of how a sports pavilion of this type and age would have originally functioned. Internally, the principal room has a 'Wrenaissance' style and retains panelled walls, heavy moulded cornice and a decorative canted ceiling. The building has undergone some alterations including the installation of electricity and the subdivision of one of the bedrooms as well as the south-west wing of the Pavilion also being extended. Although the building has undergone alterations, the evidential value of the Pavilion is considered to be **good**.

Aesthetic Value

- 6.23 The building is considered to have a **good** level of aesthetic value as it retains a strong architectural character. The Pavilion faces north-west onto the adjacent sports ground and has two angled wings which contain changing facilities. A third range extends south-eastwards which connects to the Groundman's House with a stable to the south side of the south-west wing. The building has a typically vernacular character, with its asymmetrical plan, that is particularly appropriate for a building encompassing numerous functions; dwelling pavilion and stables. Overall, the building represents a coherent composition, which has a visual connection with the surrounding built form and open green space.

Historic Value

- 6.24 The Pavilion was construction to the designs of Reginald Francis Wheatly and Edward Ford Duncanson. The first groundsman, William Johns Masters Manning, lived in the attached Groundman's house as soon as it was constructed.
- 6.25 The Pavilion does not appear to have any comparable listed examples which incorporate a Groundsman's house and stabling and as such is considered to have a **good** level of historic value.

Communal Value

- 6.26 The building is considered to have a **good** level of communal value. This is derived through its distinctive use as a Pavilion, which served the local community and its identity within the sport grounds.

Setting

- 6.27 In accordance with our methodology and '**Step 2**' of Historic England's GPA3, an assessment of the setting of the designated and non- designated built form has been undertaken. A summary of our findings in relation to the Pavilion is presented below and its full assessment can be found in **Appendix 3**.
- 6.28 The immediate setting of the Pavilion is considered to be formed by the sports fields in which it is located and its relationship with Wilberforce Road. The openness of the sports field allows wide and sweeping views of the Pavilion from within the grounds and along the streetscape and vice versa. The wider setting is formed by the built form of the surrounding development to the north, east and west as well the University Sports Ground in the south.
- 6.29 Both the immediate and extended settings make a **good** contribution to the significance of the building.

9 Wilberforce Road

- 6.30 9 Wilberforce Road is a 1930's building located to the east of Wilberforce Road. The building was added to the Statutory List in August 1996 at Grade II.

Evidential Value

- 6.31 Dating to 1937, the building is constructed in whitewashed brick laid in Flemish bond with a bituminous felt roof, and comprises two storeys and a roof patio. The building appears to have been little altered and as such retains a **good** level of evidential value.



Figure 13 - 9 Wilberforce Road

Aesthetic value

- 6.32 The building is considered to have a **good** level of aesthetic value as it is one of a small number of Modern Movement houses in Cambridge. It is constructed with a rectangular plan form with a recessed section at south-east corner. The façade facing onto the street has a 3-window range with a glazed door set left of centre beneath projecting flat porch hood which extends over garage to left. Of particular interest, is the roof patio which consists of a single room with wrap-around Crittal windows over which projects a flat canopy roof supported on circular-section iron posts.

Historic value

- 6.33 9 Wilberforce Way has a **medium/ good** historic value. It represents a good example of a 1930s Modern Movement house, in this part of the country. It was designed by D. Cosens and forms part of a wider development of suburban housing.

Communal Value

- 6.34 The building has a **medium** level of communal value due to its residential use, positioning on the streetscape and connection with the wider built form.

Setting

- 6.35 The immediate setting of the building is formed by its domestic curtilage, which is enclosed to the Wilberforce Road elevation by a hedgerow.
- 6.36 The extended setting is formed by the Wilberforce Road sport grounds to the west. An area of wooded pond to the west and built form to both the north and south. Both these elements of immediate and extended setting make a **good** contribution to the overall significance of the building.

7.0 Non-designated Heritage Assets

19 Wilberforce Road – Building of Local interest

- 7.1 19 Wilberforce Road is a mid-20th century building located to the south-east of the proposed site. The building is not Statutorily Listed but has been highlighted by the City Council as a Building of Local Interest.

Evidential value

- 7.2 The building was constructed in circa 1934 to the designs of H C Hughes but has been much altered. It is two storeys high with white painted render and steel casement windows arranged in groups of two or five lights. A loggia sits at roof level, protecting a roof terrace, with views westwards across the Emmanuel College Sports Ground. Although the building has been altered and extended it retains a **medium** level of evidential value.



Figure 14 - Aerial view of 19 Wilberforce Road

Aesthetic Value

- 7.3 The building has a modern movement aesthetic with rendered walls, simple window openings and sharp building lines. The building also has a turret type addition to its northern elevation which adds visual interest to the building. Thus, the building is considered to have a **medium** level of aesthetic value.

Historic Value

- 7.4 The building is a moderate example of its type and does not appear to be associated with renowned historic occupants or architects of interest. However, the building does display evidence of architectural expression and detailing which is unusual for the area and as such, has a **medium** level of historic value.

Communal Value

- 7.5 The building is considered to have a **low/ medium** level of communal value due to its residential use and positioning on the streetscape

Setting

- 7.6 The immediate setting of the building is formed by its domestic curtilage. The extended setting is formed by the Wilberforce Road, adjacent built form and sport grounds opposite. Both the immediate and extended settings make a **good** contribution to the setting of the building.

Nos 6 – 11 Bulstrode Gardens – Positive Unlisted Buildings;

- 7.7 Bulstrode Gardens date to the mid 20th century. Nos 6 – 11 are all detached properties, set back from the road with deep back gardens. The buildings are not Statutorily listed but have been highlighted as 'positive unlisted buildings'.



Figure 15 - Aerial view of nos 6 - 11 Bulstrode Gardens

- Evidential value
- 7.8 The buildings date to the mid-20th century and are two storeys in height with an Arts & Crafts type aesthetic. The buildings appear to have been altered and extended in places but retain a **medium/ low** level of evidential value.

Aesthetic Value

- 7.9 The buildings describe their evolution in their construction materials. These materials possess an aesthetic merit, and its Arts & Craft appearance is an appealing design. In their wider context, views of the buildings can be gained along the Bulstrode Gardens but are limited from the wider landscape due to intervening built form and mature vegetation. In terms of their aesthetic value the buildings convey a **medium/ low** level of aesthetic value.

Historic value

- 7.10 The buildings do not appear to be associated with renowned occupants or an architect of interest and represent modest example for their age and type. As such, they are considered to have a **low** historic value.

Communal Value

- 7.11 Due to their residential use and location the buildings are considered to have **low** communal value.

Setting

- 7.12 The immediate settings of the buildings are formed by the domestic curtilage in which they sit and their relationship with Bulstrode Gardens. The extended setting is formed by the adjacent built form seen along Bulstrode Gardens, Wilberforce Road and Hedgerley close. The sport grounds to the south also forms part of this extended setting, although at some distance. Both elements make a **good** level of contribution to the overall significance of the buildings.

Nos 4 and 5 Hedgerley Close – Positive Unlisted Buildings

- 7.13 Hedgerley Close is of a similar date to Bulstrode Gardens. Nos 4 and 5 are detached properties which have been highlighted as 'positive unlisted buildings' within the West Cambridge Conservation Area.

Evidential Value

- 7.14 The buildings date to the mid-20th century and have a simple Arts & Crafts aesthetic. The buildings are two storeys in height with accommodation at attic level seen to no 4. The buildings appear to have been altered over time but retain a **medium/ low** level of aesthetic value.



Figure 16 - Aerial View of Nos 4 and 5 Hedgerley Close

Aesthetic Value

- 7.15 The buildings describe their evolution within their construction materials. The simple Arts & Craft design possess an aesthetic merit which is complementary to the surrounding built form. In their wider context views of the buildings can be gained along the Hedgerley Close but views are limited from the wider landscape due to intervening built form and mature vegetation. In terms of their aesthetic value the buildings convey a **medium/ low** level of aesthetic value.

Historic Value

- 7.16 The buildings represent modest example for their age and type and do not appear to be associated with renowned occupants or architects of interest. As such, they are considered to have a **low** historic value.

Communal Value

- 7.17 Due to their residential use, and location, the buildings are considered to have **low** communal value.

Setting

- 7.18 The immediate settings of the buildings are formed by the domestic curtilage in which they sit and their relationship with Hedgerley Gardens. The extended setting is formed by the adjacent built form, in particular the houses constructed to the rear of the properties. The sport grounds to the south does form part of this extended setting, although is blocked from view to a large degree by the aforementioned buildings. Both elements of setting do however, make a **good** level of contribution to the overall significance of the buildings.

8.0 Summary of Significance

8.1 Below is a summary of the overall significance of each identified heritage asset. The significance of the asset is a combination of its evidential, aesthetic, historic and communal values. Following on from this is an illustrative plan showing these values.

ASSET	DESIGNATION	EVIDENTIAL VALUE	AESTHETIC VALUE	HISTORIC VALUE	COMMUNAL VALUE	OVERALL SIGNIFICANCE	CONTRIBUTION OF SETTING
West Cambridge	Conservation Area	Good	Good	Good	Good	Good	N/A
Emmanuel College Sports Pavilion	Grade II listed building	Good	Good	Good	Good	Good	Good
9 Wilberforce Road	Grade II listed building	Good	Good	Medium/ Good	Medium	Good	Good
19 Wilberforce Road	Building of Local Interest	Medium	Medium	Medium	Medium/ Low	Medium	Good
Nos 6-11 Bulstrode Gardens	Positive Unlisted Buildings	Medium/ Low	Medium/ Low	Low	Low	Medium/ Low	Good
Nos 4 – 5 Hedgerley Close	Positive Unlisted Buildings	Medium/ Low	Medium/ Low	Low	Low	Medium /Low	High



Figure 17 – Plan showing site boundary and overall significance levels of all identified heritage assets

9.0 Proposed Concept Framework Plan

- 9.1 A proposed Concept Framework Plan has been created to illustrate the potential layout of the site, if allocated for residential development. The layout of the development has been approached to ensure it minimises the impact on surrounding heritage assets.

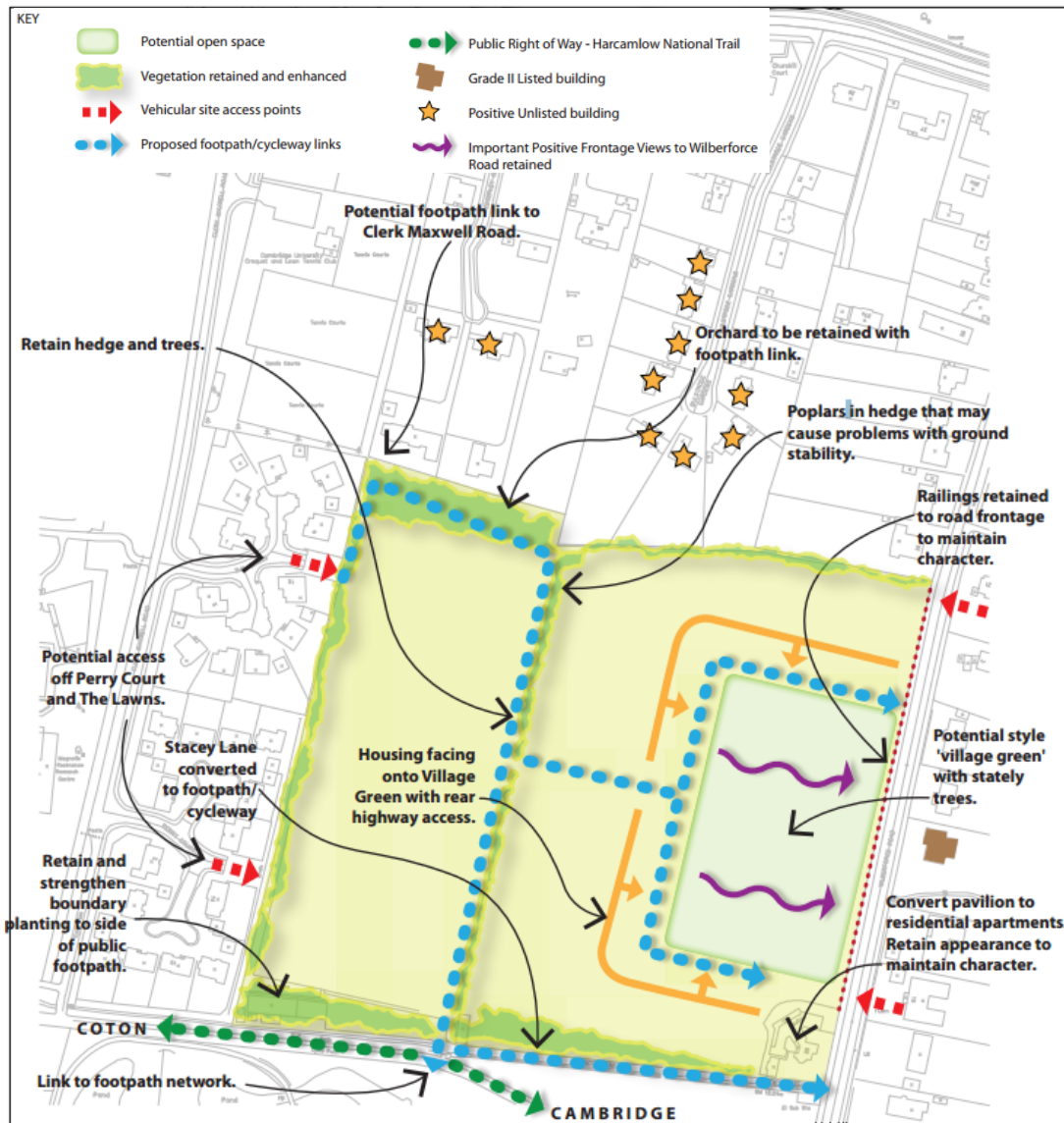


Figure 18 - Opportunities and Constraints Plan (Drawing No. S037500100-01)

- 9.2 An Opportunity and Constraints plan has also been produced to highlight the approach taken to the layout of the site. Since the plan was drawn the Pavilion has been added to the Statutory List of buildings of architectural or historic interest.
- 9.3 The Opportunities plan highlights a positive approach to the development of the site including the retention of the railings along Wilberforce Road as well as the retention and strengthening of a number of existing mature vegetation on site. It is based on the fundamental intention to retain a large open space alongside Wilberforce Toad, thereby maintaining this part of its existing character.

- 9.4 Following on from this Opportunity and Constraints Plan a Concept Framework Plan was developed to highlight a potential approach to the residential development of the site. A key part of this approach is the retention of an area of open green space fronting onto Wilberforce Road. This space is located to the north of the Grade II listed Pavilion and to the west of the Grade II listed 9 Wilberforce Road.
- 9.5 Beyond this open space, it is proposed to create low-density housing, with affordable housing beyond, moving into medium density as the site moves westwards. It is also proposed to consider the potential for conversion of the Pavilion for residential use, ensuring its long-term viability. The detailed approach to this conversion would need to be carefully considered and discussions held with the Cambridge City Council Conservation Officer, particularly as the Pavilion has been added to the Statutory List since this was produced.

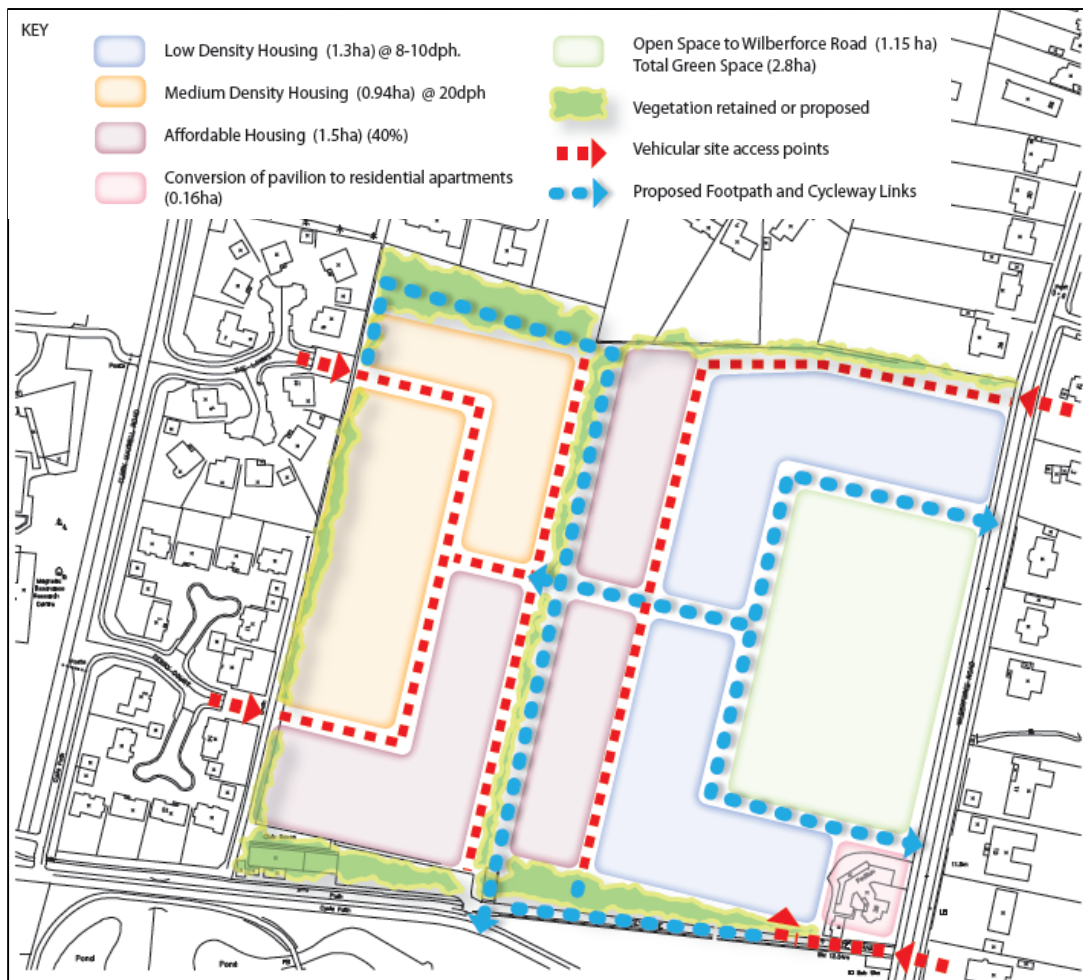


Figure 19 - Concept Framework Plan (Drawing reference No. S037055100-02)

10.0 Impact Assessment

- 10.1 In order to assess the suitability of the site for residential purposes, it is necessary to determine the *nature* and *extent* of any impacts resulting from the proposal on heritage assets and/ or their settings.
- 10.2 When assessing the impact of a proposed development on individual or groups of heritage assets, it is important to assess both the potential, direct physical impacts of the development scheme as well as the potential impacts on their settings and where effects on setting would result in harm to the significance of the asset. It is equally important to identify benefits to settings, where they result from proposals.
- 10.3 The proposed development is considered below in terms of its impact on the significance of the heritage assets, and the contribution which setting makes to their significance. Assessment of impact levels are made with reference to Table 2 in Section 3 and satisfy '**Step 3**' of Historic England's GPA 3.
- 10.4 Due to the physical separation between the site and the surrounding heritage assets, there will be **no direct physical impact** on them as a result of the proposed scheme. This is with the possible exception of the Pavilion building which may be considered for conversion to ensure it has a long term, viable use. There is no detailed proposal for this at present and it is therefore not considered further within this document.
- 10.5 Impacts arising will relate to potential effects on the immediate and extended settings of the heritage assets and the impact this may have on their significance.

West Cambridge Conservation Area – designated heritage asset

- 10.6 As highlighted within Section 6 of this document, the West Cambridge Conservation Area is considered to have a **good** level of significance, with the proposed site making a **good** contribution to this significance.
- 10.7 The proposed allocation of the site, and associated residential development, will result in an apparent change to the character and appearance of this part of the Conservation Area. There will be a reduction in the ability to appreciate the open character of this part of the Conservation Area which will result in some reduction in the ability to appreciate its overall significance. However, the degree to which a sense of open space can be maintained will relate directly to the extent to which the character and contribution of this land can be preserved alongside the development itself.
- 10.8 With this outcome in mind, it is apparent that the contribution which this area of land makes to the wider Conservation Area reduces as it moves west towards the edge of the site boundary and subsequent edge of the Conservation Area. The north-south divide created by the existing trees and hedges, a remnant of the historic field boundaries, effectively curtails the open views across this part of the site. To this end, it is apparent that the level of potential harm is reduced within this western side of the site.
- 10.9 To help mitigate any potential effects within the eastern parcel of the site the indicative concept framework highlights the potential principles of development which incorporate a large area of open space between the proposed development and Wilberforce Road.
- 10.10 The retention of this open space creates an evident separation between Wilberforce Road and the new built form. This 'buffer zone' is consistent with the existing character of the land and does

not seek to utilise screen planting which would otherwise curtail the sense of openness. The concept design pays special attention to the existing character and appearance of the site.

- 10.11 In addition to this buffer zone, the treatment, layout, design, scale, materials, landscaping of the development could be designed so as to deliver a dispersed character of built form with a gradient of lower density development in the east and medium to the west. Compliance with this, and other, aspects of the indicative concept framework, could be reserved alongside the allocation of the site.
- 10.12 Although the retention of public open space and existing vegetation goes towards preserving the site's contribution to the character and appearance of the Conservation Area, there will be an apparent change in character within the site, particularly in its eastern side as it passes from recreational to residential use. There will be a reduction in the ability to appreciate the existing character of the land, therefore, although its characteristics and contribution will be somewhat protected, the result of the development will bring some harm to the significance of the Conservation Area.
- 10.13 In our opinion, the level of this harm to significance as a result of impact on setting is **medium adverse**, equating to "less than substantial" harm. This identified level of harm should be weighed in the context of the public benefits to be delivered by the proposed scheme, in accordance with Paragraph 134 of the NPPF.

Emmanuel College Sports Pavilion – Grade II listed building

- 10.14 The Pavilion, which was added to the Statutory List in 2014, is located in the south-eastern corner of the Emmanuel Sports Ground. As previously discussed, the Sports Ground forms part of the setting of the building and is part of its history and functionality. The proposed development of the site would result in a loss to the existing open character of this setting.
- 10.15 Therefore, the degree to which a sense of openness can be maintained within the adjacent area will relate directly to the extent to which the integrity of the setting can be protected. Thus, maintaining the sense of the functional and visual contribution this area makes to the setting and overall significance of the listed building will be a desirable objective in order to satisfy the provisions of Section 16(2) of the Act.
- 10.16 Although the existing buffer zone maintains a sense of separation between the listed building and built form, this was conceived prior to the building being added to the Statutory list, and as such it is evident that the 'buffer zone' should be increased around the building in order to further minimise the potential impact on the Pavilion.
- 10.17 Even with an increased 'buffer zone' there will be some reduction in the sense of openness around the building and a change in character within the existing Sports Ground as it passes from recreational to residential use. This reduction in the ability to appreciate the existing character of the land and its resultant contribution to the significance of the listed building therefore results in harm to that significance. In our opinion, the effect of this harm to significance as a result of impact on setting is at the level of **medium adverse**. This would be considered to represent "*less than substantial*" harm in the context of the NPPF and could be further mitigated by the layout, design and scale of proposed dwellings.

9 Wilberforce Road

- 10.18 9 Wilberforce Road is located directly opposite the Emmanuel College Sports Ground on the eastern side of the Road. Although the building is set back from the street, views across the open sport grounds can be seen from within the plot. As previously discussed, the indicative framework

shows an area of open space located directly in front of the listed building. The retention of this open space and the proposed lack of screen planting ensures a sense of openness is retained and helps mitigate the impact on the setting of the building.

- 10.19 A proposed footpath and cycle link is shown on the indicative framework which allows views from within the plot of No. 9 to extend further than the proposed open space, into the existing Gonville & Caius Sports Field. The extension of this views helps to further mitigate any potential impacts on the setting of the listed building.
- 10.20 Overall, it is considered that the existing Sports Ground forms part of the extended setting of the building and the evident change in character from recreational to residential would result in harm to the extended setting of the building. This harm is considered to be at a level of **minor adverse**, equating to a '*less than substantial impact*'.

19 Wilberforce Road – Building of Interest

- 10.21 19 Wilberforce Road is located to the south-east of the site, on the eastern side of Wilberforce Road. The building is set back within its own plot behind an existing mature hedgerow and trees. Due to the position of the building within its plot, the existing vegetation and the built form of the Pavilion views out across the Emmanuel College Sports Ground are limited.
- 10.22 As a result of the proposed mitigation of the retention of an area of open space fronting onto Wilberforce Road, the potential impact on the extended setting of this building is significantly reduced. As such, it is considered that, on the basis of an increase 'buffer zone' provided, the proposed residential development of the site will result in a **negligible** impact on the setting, and as a consequence, the overall significance of the building.

No 6 – 11 Bulstrode Gardens – Positive Unlisted Buildings

- 10.23 The hierarchy of the settlement means that the principal elevations of the buildings orientate towards Bulstrode Gardens. This results in the main elevations of all the houses facing away from the site. To the rear of these buildings are deep gardens, with existing mature vegetation present, which visually separate the buildings from the proposed site.
- 10.24 The boundary edge between the gardens of these buildings and the proposed site, is also shown within the concept framework as retained. The retention of this boundary vegetation, coupled with the deep nature of the existing gardens and existing mature vegetation within, would result in direct views of the new development being filtered through this vegetation.
- 10.25 When considering the overall heritage value of these buildings, which as discussed within Section, the overall impact on the significance of these buildings would be **negligible**, at the lowest end of the scale.
- 10.26 This harm should be considered in the context of Paragraph 135 of the NPPF and a balanced judgement should be made having regard to the scale of any harm or loss and the significance of the heritage asset.

4 – 5 Hedgerley Close – positive Unlisted Buildings

- 10.27 As with the properties within Bulstrode Gardens, the principal elevations of Nos 4 and 5 face north onto Hedgerley Close away from the proposed site. In addition to this, dwellings have been construction immediately behind these properties which physically and visually separate them from the Emmanuel College and Gonville & Caius Sport Grounds.

10.28 Coupled with the existing mature vegetation found along the boundary of the site and within the gardens of the properties, there are limited to none direct views of the sport grounds. As a result, the proposed residential development of the site would have **no impact** on the significance of these buildings.

11.0 Summary of Impact

ASSET	DESIGNATION	OVERALL SIGNIFICANCE	PHYSICAL IMPACT	IMPACT ON SETTING
West Cambridge	Conservation Area	Good	Medium adverse	N/A
Emmanuel College Sports Pavilion	Grade II listed building	Good	N/A (potential for conversion works not considered)	Medium adverse
9 Wilberforce Road	Grade II listed building	Good	None	Minor Adverse
19 Wilberforce Road	Building of Local Interest	Medium	None	Negligible
Nos 6-11 Bulstrode Gardens	Positive Unlisted Buildings	Medium/ Low	None	Negligible
Nos 4 – 5 Hedgerley Close	Positive Unlisted Buildings	Medium /Low	None	Negligible

12.0 Conclusion

- 12.1 This Heritage Assessment has been prepared on behalf of Emmanuel and Gonville & Caius Colleges to assess the impact of the proposed allocation of this site for residential purposes, on heritage assets.
- 12.2 As a result of our assessments on site, it is considered that the proposed allocation would result in impacts ranging from **no impact** to **negligible** and **minor/ medium adverse** to the setting of designated and non-designated heritage assets.
- 12.3 There would be **no impact** on the contribution that the settings make to the significance of Nos 4 and 5 Hedgerley Close. It is also considered that there will be a **negligible** impact on No 19 Wilberforce Road and Nos 6-11 Bulstrode Gardens.
- 12.4 It is considered that there would be a **medium adverse** impact on the significance of the West Cambridge Conservation Area, as a result of the change in character of the application site. The concept framework achieves an arrangement which seeks to minimise impacts so as to retain an area of open space, the railings to the front of the site and existing trees within the site. As a result, the principal contributions of the site to the character and appearance of the Conservation Area are protected, but there would be some harm arising.
- 12.5 With relation to the impact on the setting of the Grade II listed Pavilion and 9 Wilberforce Road, the proposed residential development of the site is considered to have a **medium adverse** and **minor adverse** impact respectively. These impacts are as a result of the reduction in the ability to appreciate the open character of the settings and their contribution this makes to their significance.
- 12.6 These aspects of **negligible**, **minor adverse** and **medium adverse** impacts are considered, in all cases, to represent “*less than substantial*” harm in the context of Paragraph 134 of the NPPF, a term which according to Bedford Borough Council v SSCLG & Nuon UK Ltd [2013] EWHC 2847 can refer to a range of impacts from an impact that is “*negligible*” in effect, to one which is “*something approaching demolition or destruction.*” In these instances, we consider that the “*less than substantial*” harm levels are at the lower end of this scale and would not incur impacts of such an effect as to infer substantial losses of significance.
- 12.7 At the level of “*less than substantial harm*”, the impacts arising from this development should be considered in the context of public benefits arising from the proposals which are set out in the EIP Statement, in accordance with Paragraph 134 of the NPPF. In applying the unweighted balance of harm and benefit, the decision-maker should satisfy themselves that considerable importance and weight has been placed on the Statutory duty contained with Section 16(2) of the 1990 Act.
- 12.8 Impacts on the non-designated heritage assets, including the Nos 6-11 Bulstrode Gardens, would be considered in the context of Paragraph 135 of the NPPF and a balanced judgement should be made having regard to the scale of any harm or loss and the significance of the heritage asset.

APPENDIX 1

HISTORIC ENGLAND DOCUMENTS

- **Conservation Principles, Policies and Guidance**
- **Historic England Advice note 1 ‘Conservation Area Designation, Appraisal and Management’**
- **Historic England Advice Note 2 ‘Making Changes to Heritage Assets’**
- **Historic England Advice Note 3 ‘The Historic Environment and Site Allocations in Local Plans’**
- **Historic England GPA Note 1 ‘The Historic Environment in Local Plans’**
- **Historic England GPA Note 2 ‘Managing Significance in Decision-Taking in the Historic Environment’**
- **Historic England ‘Seeing History in the View’**

Historic England GPA 3 ‘Setting of Heritage Assets’ is not included within this Appendix as, along with the NPPF and NPPG, it is a Core Document.

CONSERVATION
PRINCIPLES
POLICIES AND GUIDANCE
FOR THE SUSTAINABLE MANAGEMENT OF THE HISTORIC ENVIRONMENT



ENGLISH HERITAGE

FOREWORD

The sustainable management of the historic environment depends on sound principles, clear policies and guidance based on those principles, and the quality of decisions that stem from their consistent application. We need a clear, over-arching philosophical framework of what conservation means at the beginning of the 21st century; and to distil current good practice in casework, given the impending reform of legislation and the need for more integrated practice.

These *Principles, Policies and Guidance* for the sustainable management of the historic environment have been developed through extensive debate and consultation, both within English Heritage and with colleagues in the historic environment sector and beyond. Our main purpose in producing the *Principles, Policies and Guidance* is to strengthen the credibility and consistency of decisions taken and advice given by English Heritage staff, improving our accountability by setting out the framework within which we will make judgements on casework. Our success will also be measured by the extent to which this document is taken up more widely in the sector.

Over time, and in conjunction with legislative reform and improving capacity in the sector, we hope that the document will help to create a progressive framework for managing change in the historic environment that is clear in purpose and sustainable in its application – constructive conservation.



Lord Bruce-Lockhart

Chairman
English Heritage
April 2008

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Using this document

- 1 English Heritage sets out in this document a logical approach to making decisions and offering guidance about all aspects of England's historic environment. This will help us to ensure consistency in carrying out our role as the Government's statutory advisor on the historic environment.
- 2 As the **Introduction** (pages 13-16) explains, we have avoided using the terminology of current heritage designations. Instead, we have adopted the term 'place' for any part of the historic environment that can be perceived as having a distinct identity.
- 3 The **Conservation Principles** (pages 19-24) provide a comprehensive framework for the sustainable management of the historic environment, under six headlines:
 - Principle 1: The historic environment is a shared resource
 - Principle 2: Everyone should be able to participate in sustaining the historic environment
 - Principle 3: Understanding the significance of places is vital
 - Principle 4: Significant places should be managed to sustain their values
 - Principle 5: Decisions about change must be reasonable, transparent and consistent
 - Principle 6: Documenting and learning from decisions is essential
- 4 We define *conservation* (under Principle 4.2) as the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.
- 5 **Understanding the values** (pages 27-32) describes a range of *heritage values*, arranged in four groups, which may be attached to places. These are:
 - Evidential value: the potential of a place to yield evidence about past human activity.
 - Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
 - Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
 - Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

- 6 Assessing heritage significance** (pages 35-40) sets out a process for *assessing the heritage significance* of a place:
- Understand the fabric and evolution of the place
 - Identify who values the place, and why they do so
 - Relate identified heritage values to the fabric of the place
 - Consider the relative importance of those identified values
 - Consider the contribution of associated objects and collections
 - Consider the contribution made by setting and context
 - Compare the place with other places sharing similar values
 - Articulate the significance of the place.
- 7 Managing change to significant places** (pages 43-48) explains how to apply the *Principles* in **making decisions** about change to significant places by:
- Establishing whether there is sufficient information to understand the impacts of potential change
 - Considering the effects on authenticity and integrity
 - Taking account of sustainability
 - Considering the potential reversibility of changes
 - Comparing options and making the decision
 - Applying mitigation
 - Monitoring and evaluating outcomes.
- 8 English Heritage Conservation Policies and Guidance** (pages 51-63), a series of *Policies* specific to some common kinds of action, followed by associated *Guidance* on their interpretation. While some of these policies have a close relationship to particular principles, it is important that they are interpreted in the context of the *Principles* as a whole. These policies, which English Heritage will follow, are that:
- 9** The conservation of significant places is founded on **appropriate routine management and maintenance**.
- 10** **Periodic renewal** of elements of a significant place, intended or inherent in the design, is normally desirable unless any harm caused to heritage values would not be recovered over time.
- 11** **Repair** necessary to sustain the heritage values of a significant place is normally desirable if:
- a. there is sufficient information comprehensively to understand the impact of the proposals on the significance of the place; and
 - b. the long term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future; and
 - c. the proposals are designed to avoid or minimise harm, if actions necessary to sustain particular heritage values tend to conflict.

- 12 Intervention in significant places primarily to increase knowledge of the past involving material loss of evidential values, should normally be acceptable if:
- a. preservation *in situ* is not reasonably practicable; or
 - b. it is demonstrated that the potential increase in knowledge
 - cannot be achieved using non-destructive techniques; and
 - is unlikely to be achieved at another place whose destruction is inevitable; and
 - is predicted decisively to outweigh the loss of the primary resource.

This policy most commonly applies to research excavation.

- 13 Restoration to a significant place should normally be acceptable if:
- a. the heritage values of the elements that would be restored decisively outweigh the values of those that would be lost;
 - b. the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence;
 - c. the form in which the place currently exists is not the result of an historically-significant event;
 - d. the work proposed respects previous forms of the place;
 - e. the maintenance implications of the proposed restoration are considered to be sustainable;
- 14 New work or alteration to a significant place should normally be acceptable if:
- a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;
 - b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;
 - c. the proposals aspire to a quality of design and execution which may be valued now and in the future;
 - d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.

- 15** Changes which would **harm the heritage values of a significant place** should be unacceptable unless:
- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;
 - b. there is no reasonably practicable alternative means of doing so without harm;
 - c. that harm has been reduced to the minimum consistent with achieving the objective;
 - d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering:
 - its comparative significance,
 - the impact on that significance, and
 - the benefits to the place itself and/or the wider community or society as a whole.
- 16** **Enabling development** to secure the future of a significant place should be unacceptable unless:
- a. it will not materially harm the heritage values of the place or its setting
 - b. it avoids detrimental fragmentation of management of the place;
 - c. it will secure the long term future of the place and, where applicable, its continued use for a sympathetic purpose;
 - d. it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid;
 - e. sufficient subsidy is not available from any other source;
 - f. it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests;
 - g. the public benefit of securing the future of the heritage asset through such enabling development decisively outweighs the disbenefits of breaching other public policies.
- 17** We conclude with a general statement about **Applying the Principles** (page 67), acknowledging that the cultural and natural heritage values of significant places, including those reflected in landscape designations, should be managed in parallel, fostering close working relationships between cultural and natural heritage interests. Finally, we provide a set of key **Definitions** (pages 71-72).

INTRODUCTION

Aims

- 18** The historic environment is central to England's cultural heritage and sense of identity, and hence a resource that should be sustained for the benefit of present and future generations. English Heritage's aim in this document is to set out a logical approach to making decisions and offering guidance about all aspects of the historic environment, and for reconciling its protection with the economic and social needs and aspirations of the people who live in it.
- 19** The *Conservation Principles, Policies and Guidance* are primarily intended to help us to ensure consistency of approach in carrying out our role as the Government's statutory advisor on the historic environment in England. Specifically, they make a contribution to addressing the challenges of modernising heritage protection by proposing an integrated approach to making decisions, based on a common process. The *Principles* look forward to the consolidated framework of heritage protection proposed in the White Paper *Heritage Protection for the 21st Century* (March 2007), but their application is not dependent upon it.
- 20** The *Principles* will inform English Heritage's approach to the management of the historic environment as a whole, including the community engagement, learning and access issues addressed under Principle 2. The *Policies and Guidance* will specifically guide our staff in applying the *Principles* to English Heritage's role in the development process, and in managing the historic sites in our care. We hope, of course, that, like all our guidance, the *Principles* will also be read and used by local authorities, property owners, developers, and their advisers. In due course, the *Principles, Policies and Guidance* will be supported by further, more detailed guidance about particular types of proposal or place, and current English Heritage guidance will make specific reference to them as it is updated.

Terms and concepts

- 21** The practice of recognising, formally protecting and conserving particular aspects of the historic environment has developed along parallel paths, trodden by different professional disciplines. The lack of a common, 'high level' terminology has been a barrier to articulating common principles, and using them to develop a more integrated approach. We have therefore deliberately avoided the specialised terminology of current law and public policy relating to heritage designations, such as 'listed building' and 'scheduled monument'. We use the word 'place' as a proxy for any part of the historic environment, including under the ground or sea, that people (not least practitioners) perceive as having a distinct identity, although recognising that there is no ideal term to cover everything from a shipwreck to a landscape.

- 22 The term 'place' goes beyond physical form, to involve all the characteristics that can contribute to a 'sense of place'. It embraces the idea that places, of any size from a bollard to a building, an historic area, a town, or a region, need to be understood and managed at different levels for different purposes; and that a particular geographical location can form part of several overlapping 'places' defined by different characteristics. Similarly, we have stretched the concept of 'fabric', commonly used to describe the material from which a building is constructed, to include all the material substance of places, including geology, archaeological deposits, structures and buildings, and the flora growing in and upon them. 'Designation' embraces any formal recognition of heritage value, including registration, listing, scheduling and inscription.
- 23 Our approach anticipates the proposed consolidation of national cultural heritage protection and, more importantly, avoids the suggestion that the *Principles* are concerned only with places that meet the particular thresholds of significance necessary for formal international, national or local designation. Beyond heritage designations, in the wider framework of environmental management and spatial planning, an understanding of the heritage values a place may have for its owners, the local community and wider communities of interest should be seen as the basis for making sound decisions about its future.
- 24 Sustainable management of a place begins with understanding and defining how, why, and to what extent it has cultural and natural heritage values: in sum, its significance. Communicating that significance to everyone concerned with a place, particularly those whose actions may affect it, is then essential if all are to act in awareness of its heritage values. Only through understanding the significance of a place is it possible to assess how the qualities that people value are vulnerable to harm or loss. That understanding should then provide the basis for developing and implementing management strategies (including maintenance, cyclical renewal and repair) that will best sustain the heritage values of the place in its setting. Every conservation decision should be based on an understanding of its likely impact on the significance of the fabric and other aspects of the place concerned.

- 25 Our definition of conservation includes the objective of sustaining heritage values. In managing significant places, 'to preserve', even accepting its established legal definition of 'to do no harm', is only one aspect of what is needed to sustain heritage values. The concept of conservation area designation, with its requirement 'to preserve or enhance', also recognises the potential for beneficial change to significant places, to reveal and reinforce value. 'To sustain' embraces both preservation and enhancement to the extent that the values of a place allow. Considered change offers the potential to enhance and add value to places, as well as generating the need to protect their established heritage values. It is the means by which each generation aspires to enrich the historic environment.

Relationship to other policy documents

- 26 Planning Policy Statement 1 *Delivering Sustainable Development* (2005) includes the explicit objective of 'protecting and enhancing the natural and historic environment'.¹ In these *Principles, Policies and Guidance*, we provide detailed guidance on sustaining the historic environment within the framework of established government policy. In particular, the document distils from Planning Policy Guidance note (PPG) 15 *Planning and the Historic Environment* (1994) and PPG16 *Archaeology and Planning* (1990) those general principles which are applicable to the historic environment as a whole. It also provides a structure within which other current English Heritage policy and guidance should be applied. The *Policies and Guidance* will be updated to refer to and reflect new heritage legislation and government policy as they emerge, and in the light of experience in use.
- 27 At the international level,² the *Principles* reflect many of the presumptions of the *World Heritage Convention*, with its call to give all natural and cultural heritage a function in the life of communities. The *Principles* are consistent with the *Granada Convention* on the protection of the architectural heritage, and the *Valletta Convention* on the protection of the archaeological heritage, both ratified by the United Kingdom. The *European Landscape Convention*, also ratified by the United Kingdom, has been influential, not least for its definition of a landscape as 'an area, as perceived by people...', and its references to the need to consider sustaining cultural values in managing all landscapes, as well as the importance of public engagement in that process.

¹ See paragraphs 5, 17-18

² *Convention concerning the Protection of the World Cultural and Natural Heritage* (UNESCO, 1972)
Convention for the Protection of the Architectural Heritage of Europe (Granada: Council of Europe, 1985, ETS 121)
European convention on the Protection of the Archaeological Heritage (Valletta: Council of Europe, 1992, ETS 143)
European Landscape Convention (Florence: Council of Europe, 2000, ETS 176)

Correlation with current and proposed legislation

- 28** The White Paper *Heritage Protection for the 21st Century* (March 2007) proposed a single national *Register of historic buildings and sites of special architectural, historic or archaeological interest*, which will include all those places currently on the statutory list of buildings of special architectural or historic interest and the schedule of monuments, the non-statutory registers of historic parks and gardens and of battlefields, and World Heritage Sites (although the latter are designated internationally). 'Historic asset' is the proposed shorthand for registered places, although marine 'historic assets' will remain outside this system. Conservation areas will continue to be designated at local level, alongside non-statutory local designations, and much of the archaeological resource will continue to be managed by policy, rather than designation.
- 29** In the proposed new national system of cultural heritage protection, 'reasons for designation' will set out why each 'historic asset' is above the threshold for designation for its 'architectural, historic or archaeological interest'. Grounds for designation will necessarily be confined to specific values under these headings, directly related to published selection criteria. The statutory basis of designation will, however, be sufficiently broad to embrace the range of values which the *Principles* identify as desirable to take into account in the management of significant places.

Equalities impact assessment

Public bodies are legally required to ensure that their plans, policies and activities do not unfairly discriminate against a group protected by equalities legislation. It is the responsibility of those public bodies for whom we provide advice to ensure that that they have conducted any relevant Equalities Impact Assessment that may be required when implementing the advice of English Heritage.

CONSERVATION PRINCIPLES

I The historic environment is a shared resource

- I.1** Our environment contains a unique and dynamic record of human activity. It has been shaped by people responding to the surroundings they inherit, and embodies the aspirations, skills and investment of successive generations.
- I.2** People value this historic environment as part of their cultural and natural heritage. It reflects the knowledge, beliefs and traditions of diverse communities. It gives distinctiveness, meaning and quality to the places in which we live, providing a sense of continuity and a source of identity. It is a social and economic asset and a resource for learning and enjoyment.
- I.3** Each generation should therefore shape and sustain the historic environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same.
- I.4** Heritage values represent a public interest in places, regardless of ownership. The use of law, public policy and public investment is justified to protect that public interest.
- I.5** Advice and assistance should be available from public sources to help owners sustain the heritage in their stewardship.

2 Everyone should be able to participate in sustaining the historic environment

- 2.1** Everyone should have the opportunity to contribute his or her knowledge of the value of places, and to participate in decisions about their future, by means that are accessible, inclusive and informed.
- 2.2** Learning is central to sustaining the historic environment. It raises people's awareness and understanding of their heritage, including the varied ways in which its values are perceived by different generations and communities. It encourages informed and active participation in caring for the historic environment.
- 2.3** Experts should use their knowledge and skills to encourage and enable others to learn about, value and care for the historic environment. They play a crucial role in discerning, communicating and sustaining the established values of places, and in helping people to refine and articulate the values they attach to places.
- 2.4** It is essential to develop, maintain and pass on the specialist knowledge and skills necessary to sustain the historic environment.

3 Understanding the significance of places is vital

- 3.1** Any fixed part of the historic environment with a distinctive identity perceived by people can be considered a place.
- 3.2** The significance of a place embraces all the diverse cultural and natural heritage values that people associate with it, or which prompt them to respond to it. These values tend to grow in strength and complexity over time, as understanding deepens and people's perceptions of a place evolve.
- 3.3** In order to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:
- who values the place, and why they do so
 - how those values relate to its fabric
 - their relative importance
 - whether associated objects contribute to them
 - the contribution made by the setting and context of the place
 - how the place compares with others sharing similar values.
- 3.4** Understanding and articulating the values and significance of a place is necessary to inform decisions about its future. The degree of significance determines what, if any, protection, including statutory designation, is appropriate under law and policy.

4 Significant places should be managed to sustain their values

- 4.1 Change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people's responses to social, economic and technological change.
- 4.2 Conservation is the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.
- 4.3 Conservation is achieved by all concerned with a significant place sharing an understanding of its significance, and using that understanding to:
- judge how its heritage values are vulnerable to change
 - take the actions and impose the constraints necessary to sustain, reveal and reinforce those values
 - mediate between conservation options, if action to sustain one heritage value could conflict with action to sustain another
 - ensure that the place retains its authenticity – those attributes and elements which most truthfully reflect and embody the heritage values attached to it.
- 4.4 Action taken to counter harmful effects of natural change, or to minimise the risk of disaster, should be timely, proportionate to the severity and likelihood of identified consequences, and sustainable.
- 4.5 Intervention may be justified if it increases understanding of the past, reveals or reinforces particular heritage values of a place, or is necessary to sustain those values for present and future generations, so long as any resulting harm is decisively outweighed by the benefits.
- 4.6 New work should aspire to a quality of design and execution which may be valued both now and in the future. This neither implies nor precludes working in traditional or new ways, but should respect the significance of a place in its setting.

5 Decisions about change must be reasonable, transparent and consistent

- 5.1** Decisions about change in the historic environment demand the application of expertise, experience and judgement, in a consistent, transparent process guided by public policy.
- 5.2** The range and depth of understanding, assessment and public engagement should be sufficient to inform and justify the decision to be made, but efficient in the use of resources. Proportionality should govern the exercise of statutory controls.
- 5.3** Potential conflict between sustaining heritage values of a place and other important public interests should be minimised by seeking the least harmful means of accommodating those interests.
- 5.4** If conflict cannot be avoided, the weight given to heritage values in making the decision should be proportionate to the significance of the place and the impact of the proposed change on that significance.

6 Documenting and learning from decisions is essential

- 6.1** Accessible records of the justification for decisions and the actions that follow them are crucial to maintaining a cumulative account of what has happened to a significant place, and understanding how and why its significance may have been altered.
- 6.2** Managers of significant places should monitor and regularly evaluate the effects of change and responses to it, and use the results to inform future decisions. Public bodies similarly should monitor and respond to the effects on the historic environment of their policies and programmes.
- 6.3** If all or part of a significant place will be lost, whether as a result of decision or inevitable natural process, its potential to yield information about the past should be realised. This requires investigation and analysis, followed by archiving and dissemination of the results, all at a level that reflects its significance.
- 6.4** Where such loss is the direct result of human intervention, the costs of this work should be borne by those who benefit from the change, or whose role it is to initiate such change in the public interest.

UNDERSTANDING HERITAGE VALUES

Preamble

- 30** People may value a place for many reasons beyond utility or personal association: for its distinctive architecture or landscape, the story it can tell about its past, its connection with notable people or events, its landform, flora and fauna, because they find it beautiful or inspiring, or for its role as a focus of a community. These are examples of cultural and natural heritage values in the historic environment that people want to enjoy and sustain for the benefit of present and future generations, at every level from the ‘familiar and cherished local scene’³ to the nationally or internationally significant place.
- 31** Many heritage values are recognised by the statutory designation and regulation of significant places, where a particular value, such as ‘architectural or historic interest’ or ‘scientific interest’, is judged to be ‘special’, that is above a defined threshold of importance. Designation necessarily requires the assessment of the importance of specific heritage values of a place; but decisions about its day-to-day management should take account of *all* the values that contribute to its significance. Moreover, the significance of a place should influence decisions about its future, whether or not it is has statutory designation.
- 32** Although most places of heritage value are used, or are capable of being used, for some practical purpose, the relationship between their utility and their heritage values can range from mutual support (in the normal situation of use justifying appropriate maintenance) to conflict. Places with heritage values can generate wider social and economic (‘instrumental’) benefits, for example as a learning or recreational resource, or as a generator of tourism or inward economic investment, although their potential to do so is affected by external factors, such as ease of access. Utility and market values, and instrumental benefits, are different from heritage values in nature and effect.
- 33** This section is intended to prompt comprehensive thought about the range of inter-related heritage values that may be attached to a place. The high level values range from evidential, which is dependent on the inherited fabric of the place, through historical and aesthetic, to communal values which derive from people’s identification with the place.
- 34** Some values can be appreciated simply as a spontaneous, although culturally influenced, response; but people’s experience of all heritage values tends to be enhanced by specific knowledge about the place.

³ PPG 15, *Planning and the historic environment* (1994), para 1.1.

Evidential value

- 35 Evidential value derives from the potential of a place to yield evidence about past human activity.
- 36 Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These remains are part of a record of the past that begins with traces of early humans and continues to be created and destroyed. Their evidential value is proportionate to their potential to contribute to people's understanding of the past.
- 37 In the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past. Age is therefore a strong indicator of relative evidential value, but is not paramount, since the material record is the primary source of evidence about poorly-documented aspects of any period. Geology, landforms, species and habitats similarly have value as sources of information about the evolution of the planet and life upon it.
- 38 Evidential value derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.

Historical value

- 39 Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be *illustrative* or *associative*.
- 40 The idea of *illustrating* aspects of history or prehistory – the perception of a place as a link between past and present people – is different from purely evidential value. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. An historic building that is one of many similar examples may provide little unique evidence about the past, although each illustrates the intentions of its creators equally well. However, their distribution, like that of planned landscapes, may be of considerable evidential value, as well as demonstrating, for instance, the distinctiveness of regions and aspects of their social organisation.

- 41 Illustrative value has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of a place. The illustrative value of places tends to be greater if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation. The concept is similarly applicable to the natural heritage values of a place, for example geological strata visible in an exposure, the survival of veteran trees, or the observable interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, a structural system or a machine might be said to have 'technological value'.
- 42 *Association* with a notable family, person, event, or movement gives historical value a particular resonance. Being at the place where something momentous happened can increase and intensify understanding through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some semblance of its appearance at the time. The way in which an individual built or furnished their house, or made a garden, often provides insight into their personality, or demonstrates their political or cultural affiliations. It can suggest aspects of their character and motivation that extend, or even contradict, what they or others wrote, or are recorded as having said, at the time, and so also provide evidential value.
- 43 Many buildings and landscapes are associated with the development of other aspects of cultural heritage, such as literature, art, music or film. Recognition of such associative values tends in turn to inform people's responses to these places. Associative value also attaches to places closely connected with the work of people who have made important discoveries or advances in thought about the natural world.
- 44 The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.

- 45 The use and appropriate management of a place for its original purpose, for example as a place of recreation or worship, or, like a watermill, as a machine, illustrates the relationship between design and function, and so may make a major contribution to its historical values. If so, cessation of that activity will diminish those values and, in the case of some specialised landscapes and buildings, may essentially destroy them. Conversely, abandonment, as of, for example, a medieval village site, may illustrate important historical events.⁴

Aesthetic value

- 46 Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.
- 47 Aesthetic values can be the result of the conscious *design* of a place, including artistic endeavour. Equally, they can be the seemingly *fortuitous* outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects – for example, where the qualities of an already attractive landscape have been reinforced by artifice – while others may inspire awe or fear. Aesthetic values tend to be specific to a time and cultural context, but appreciation of them is not culturally exclusive.
- 48 *Design value* relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. It embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship. It may extend to an intellectual programme governing the design (for example, a building as an expression of the Holy Trinity), and the choice or influence of sources from which it was derived. It may be attributed to a known patron, architect, designer, gardener or craftsman (and so have associational value), or be a mature product of a vernacular tradition of building or land management. Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.
- 49 Sustaining design value tends to depend on appropriate stewardship to maintain the integrity of a designed concept, be it landscape, architecture, or structure.
- 50 It can be useful to draw a distinction between design created through detailed instructions (such as architectural drawings) and the direct creation of a work of art by a designer who is also in significant part the craftsman. The value of the artwork is proportionate to the extent that it remains the actual product of the artist's hand. While the difference between design and 'artistic' value can be clear-cut, for example statues on pedestals (artistic value) in a formal garden (design value), it is often far less so, as with repetitive ornament on a medieval building,

⁴ For guidance on the restoration on ruins see para 133, on alterations to sustain use, para 154.

- 51 Some aesthetic values are not substantially the product of formal design, but develop more or less *fortuitously* over time, as the result of a succession of responses within a particular cultural framework. They include, for example, the seemingly organic form of an urban or rural landscape; the relationship of vernacular buildings and structures and their materials to their setting; or a harmonious, expressive or dramatic quality in the juxtaposition of vernacular or industrial buildings and spaces. Design in accordance with Picturesque theory is best considered a design value.
- 52 Aesthetic value resulting from the action of nature on human works, particularly the enhancement of the appearance of a place by the passage of time ('the patina of age'), may overlie the values of a conscious design. It may simply add to the range and depth of values, the significance, of the whole; but on occasion may be in conflict with some of them, for example, when physical damage is caused by vegetation charmingly rooting in masonry.
- 53 While aesthetic values may be related to the age of a place, they may also (apart from artistic value) be amenable to restoration and enhancement. This reality is reflected both in the definition of conservation areas (areas whose 'character or appearance it is desirable to preserve or enhance') and in current practice in the conservation of historic landscapes.

Communal value

- 54 Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.
- 55 *Commemorative* and *symbolic* values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. The most obvious examples are war and other memorials raised by community effort, which consciously evoke past lives and events, but some buildings and places, such as the Palace of Westminster, can symbolise wider values. Such values tend to change over time, and are not always affirmative. Some places may be important for reminding us of uncomfortable events, attitudes or periods in England's history. They are important aspects of collective memory and identity, places of remembrance whose meanings should not be forgotten. In some cases, that meaning can only be understood through information and interpretation, whereas, in others, the character of the place itself tells most of the story.

- 56** *Social value* is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them. They tend to gain value through the resonance of past events in the present, providing reference points for a community's identity or sense of itself. They may have fulfilled a community function that has generated a deeper attachment, or shaped some aspect of community behaviour or attitudes. Social value can also be expressed on a large scale, with great time-depth, through regional and national identity.
- 57** The social values of places are not always clearly recognised by those who share them, and may only be articulated when the future of a place is threatened. They may relate to an activity that is associated with the place, rather than with its physical fabric. The social value of a place may indeed have no direct relationship to any formal historical or aesthetic values that may have been ascribed to it.
- 58** Compared with other heritage values, social values tend to be less dependent on the survival of historic fabric. They may survive the replacement of the original physical structure, so long as its key social and cultural characteristics are maintained; and can be the popular driving force for the re-creation of lost (and often deliberately destroyed or desecrated) places with high symbolic value, although this is rare in England.
- 59** Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.
- 60** Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.

Preamble

- 61 Understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment. This section sets out such a process, which can be applied not only to places already acknowledged as significant, but also to those where the potential for change generates the need for assessment. Not all stages will be applicable to all places.

Understand the fabric and evolution of the place

- 62 To identify the cultural and natural heritage values of a place, its history, fabric and character must first be understood. This should include its origins, how and why it has changed over time (and will continue to change if undisturbed), the form and condition of its constituent elements and materials, the technology of its construction, any habitats it provides, and comparison with similar places. Its history of ownership may be relevant, not only to its heritage values, but also to its current state.
- 63 The study of material remains alone will rarely provide sufficient understanding of a place. The information gained will need to be set in the context of knowledge of the social and cultural circumstances that produced the place. Documentation underpinning any existing statutory designations is also important. Historical and archaeological archives always help with understanding how and why the place has changed over time, as may personal recollections, which can be fundamental to identifying some historical and communal values. Published research frameworks may highlight particular aspects of evidential value or potential, but absence of evidence is not evidence of absence, especially of concealed or buried remains.
- 64 Historic Environment Records play a vital role in developing a comprehensive and dynamic information resource, both for understanding particular places and as a wider research tool. Key elements of documentation generated through understanding places, and making changes to significant places, should be copied to Historic Environment Records, as well as remaining accessible to everyone directly concerned with the place.

- 65 Extensive mapping, description, understanding and assessment – ‘characterisation’ – can facilitate rapid analysis of large areas, both urban and rural. Its aim is to help people recognise how the past has shaped the present landscape, by identifying the distinctive historic elements of an area, and explaining past contexts of particular places within it.⁵

Identify who values the place, and why they do so

- 66 To provide a sound basis for management, the people and communities who are likely to attach heritage values to a place should be identified, and the range of those values understood and articulated, not just those that may be a focus of contention. This involves engaging with owners, communities and specialists with a sufficient range of knowledge of the place, subject to the need for proportionality.
- 67 Different people and communities may attach different weight to the same heritage values of a place at the same time. Experience shows that judgements about heritage values, especially those relating to the recent past, tend to grow in strength and complexity over time, as people’s perceptions of a place evolve. It is therefore necessary to consider whether a place might be so valued in the future that it should be protected now.
- 68 Understanding the history of a place does not necessarily make it significant; but the process of investigation often generates and helps to define perceptions of heritage value. This may happen through physical or documentary discoveries, or dialogue; but equally may be prompted by the articulation of links between the qualities of a particular place and the evolution of the culture that produced it, or the events that happened there.

⁵ See *Boundless Horizons: Historic Landscape Characterisation* and *Using Historic Landscape Characterisation* (English Heritage, 2004) and at a more detailed level, *Guidance on conservation area appraisals* (English Heritage, 2006).

Relate identified heritage values to the fabric of the place

- 69 An assessment of significance will normally need to identify how particular parts of a place and different periods in its evolution contribute to, or detract from, each identified strand of cultural and natural heritage value. This is current practice in statutory designation, in relation to those particular values that are the basis of selection. The most useful categories for differentiating between the components of a place ('what') are temporal ('when', often linked to 'by whom') and spatial ('where', 'which part', often linked to 'why'). Understanding a place should produce a chronological sequence of varying precision, allowing its surviving elements to be ascribed to 'phases' in its evolution. Some phases are likely to be of greater significance than others, while some values, such as historical or communal, will apply to the place as a whole. For example:

'The evidential value and potential of Smith's Hall lies primarily in the timber-framed elements of the medieval hall house and 16th century cross-wing, and to a moderate extent in the 18th century alterations and partial casing. The latter is, however, of high architectural value, marred by superficial 19th century accretions, but complemented by a study extension of c1970 by A Architect. The contemporary garden is an outstanding design, integrating framework, sculpture and planting. The building well illustrates a regionally typical pattern of development from a medieval core, and its historical value is enhanced by its association with the writer A Wordsmith who commissioned the study and garden. Since his death Smith's Hall has developed as a creative writing centre and the focus of an annual literary festival'.⁶

- 70 In other cases, differentiation will be spatial, for example:

'The street block of the factory was designed by A N Other to demonstrate the architectural potential of the company's terracotta; it is a bold and well-proportioned design which was followed by others in the district. Its architectural value is reinforced by the technological [*ie illustrative historical*] value of the fireproof construction of the floors using hollow pots. The rear block, although it followed soon afterwards, is by contrast architecturally entirely typical of its date and place. While of lesser architectural value, it and the other buildings on the site, each of which fulfilled a specific role in the manufacturing process, are collectively of high evidential and historical value.'

- 71 In many cases, differentiation will be a combination of the spatial and the temporal. It will normally best be illustrated by maps or plans showing the age and relative significance of the components or character areas of a place. Where the assessment is prompted by potential change, it is important that elements that would be directly affected are addressed at an appropriate level of detail, but always in relation to the place as a whole.

⁶ As a result of which it may also acquire social value over time.

Consider the relative importance of those identified values

- 72** It is normally desirable to sustain all the identified heritage values of a place, both cultural and natural; but on occasion, what is necessary to sustain some values will conflict with what is necessary to sustain others (paragraphs 91-92). If so, understanding the relative contribution of each identified heritage value to the overall value of the place – its significance – will be essential to objective decision-making. A balanced view is best arrived at through enabling all interested parties to appreciate their differing perspectives and priorities.
- 73** As the 'Smith's Hall' example above demonstrates, some elements of a place may actually mar or conceal its significance. Identifying these is current good practice in statutory designation, both national and local, the latter through conservation area character appraisals. Eliminating or mitigating negative characteristics may help to reveal or reinforce heritage values of a place and thus its significance.

Consider the contribution of associated objects and collections

- 74** Historically-associated objects can make a major contribution to the significance of a place, and association with the place can add heritage value to those objects. The range includes, but is not limited to, artefacts recovered through archaeological fieldwork, artworks and furnishings, collections, tools and machinery, and related archives, both historical and archaeological. The value of the whole is usually more than the sum of the parts, so that permanent separation devalues both place and objects. The contribution of such objects and archives, including evolving collections, should be articulated, even if they are currently held elsewhere, and regardless of whether their contribution falls within the scope of statutory protection.
- 75** Where places have been created around accumulated collections (for example, museums or libraries), the interior of a room or part of a garden has been designed as an entity (including a specific collection of furniture or sculpture, as well as fixed elements), or where an industrial building was designed around or to accommodate particular machinery, the relationship between the objects or elements and the place is fundamental to the significance of the place.

Consider the contribution made by setting and context

- 76** 'Setting' is an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape. Definition of the setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place's significance.
- 77** 'Context' embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places.

Compare the place with other places sharing similar values

- 78** Understanding the importance of a place by comparing it with other places that demonstrate similar values normally involves considering:
- how strongly are the identified heritage values demonstrated or represented by the place, compared with those other places?
 - how do its values relate to statutory designation criteria, and any existing statutory designations of the place?
- 79** Designation at an international, national or local level is an indicator of the importance of particular value(s) of a place; but the absence of statutory designation does not necessarily imply lack of significance. Detailed research and analysis may reveal new evidence about any place, and designation criteria are reviewed from time to time. The heritage values of a place established through detailed study should therefore normally be compared with current selection criteria for designation or the application of protective policies.

- 80** Value-based judgements about elements of the historic environment have implications both for places and for everyone with an interest in them. Such judgements provide the basis for decisions about whether, or to what extent, a place should be conserved, rather than remade or replaced. Designation forms the basis of the statutory system of heritage protection. It may have important financial and other consequences for owners, while the refusal to designate may mean the loss of a place to which some people attached considerable significance. Consistency of judgement is therefore crucial to the public acceptability and fairness of the process. Detailed criteria for statutory designation, periodically updated,⁷ and a methodical articulation of how a particular place does or does not meet such criteria, make a major contribution to achieving that consistency.
- 81** The fact that a place does not meet current criteria for formal designation does not negate the values it may have to particular communities. Such values should be taken into account in making decisions about its future through the spatial planning system,⁸ or incentive schemes like Environmental Stewardship.

Articulate the significance of the place

- 82** A 'statement of significance' of a place should be a summary of the cultural and natural heritage values currently attached to it and how they inter-relate, which distils the particular character of the place. It should explain the relative importance of the heritage values of the place (where appropriate, by reference to criteria for statutory designation), how they relate to its physical fabric, the extent of any uncertainty about its values (particularly in relation to potential for hidden or buried elements), and identify any tensions between potentially conflicting values. So far as possible, it should be agreed by all who have an interest in the place. The result should guide all decisions about material change to a significant place.
- 83** Assessments in support of a decision that a place passes the threshold for statutory designation for a particular value normally stand the test of time. However, the values of a place tend to extend beyond those which justify designation, and to grow in strength and complexity as time passes (Principle 3.3). A statement of significance is an informed and inclusive judgement made on a particular set of data, applying prevailing perceptions of value, primarily to inform the management of a significant place. The statement will therefore need review in the light of new information, and periodically to reflect evolving perceptions of value (Principle 3.4).

⁷ Communities and Local Government Circular 01/2007, *Revision to principles of selection for listing buildings* complemented by detailed *Selection Guides* for particular building types produced by English Heritage, are a major step towards achieving this objective for listed buildings.

⁸ In line with the *European Landscape Convention*, Articles 5, 6.

MANAGING CHANGE
TO SIGNIFICANT
PLACES

Preamble

- 84** Conservation involves people managing change to a significant place in its setting, in ways that sustain, reveal or reinforce its cultural and natural heritage values (Principle 4.2). Conservation is not limited to physical intervention, for it includes such activities as the interpretation and sustainable use of places. It may simply involve maintaining the *status quo*, intervening only as necessary to counter the effects of growth and decay, but equally may be achieved through major interventions; it can be active as well as reactive. Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effect on heritage values. It is only harmful if (and to the extent that) significance is eroded.
- 85** The public interest in significant places is recognised through specific legislative and policy constraints on their owners, but there are few fiscal concessions to encourage conservation, and direct financial assistance is very limited. It is the potential of significant places to be used and enjoyed that generates value in the market or to a community, and so tends to motivate and enable their owners to exercise positive, informed stewardship. Very few significant places can be maintained at either public or private expense unless they are capable of some beneficial use; nor would it be desirable, even if it were practical, for most places that people value to become solely memorials of the past.
- 86** Keeping a significant place in use is likely to require continual adaptation and change; but, provided such interventions respect the values of the place, they will tend to benefit public (heritage) as well as private interests in it. Many places now valued as part of the historic environment exist because of past patronage and private investment, and the work of successive generations often contributes to their significance. Owners and managers of significant places should not be discouraged from adding further layers of potential future interest and value, provided that recognised heritage values are not eroded or compromised in the process.
- 87** The shared public and private interest in sustaining significant places in use demands mutual co-operation and respect between owners or managers and regulators. The best use for a significant place – its 'optimum viable use'⁹ – is one that is both capable of sustaining the place and avoids or minimises harm to its values in its setting. It is not necessarily the most profitable use if that would entail greater harm than other viable uses.

⁹ PPG 15, paragraph 3.9, in the context of listed buildings, but the principle is applicable to most significant places.

- 88 Decisions about change to significant places may be influenced by a range of interests. They may involve balancing the heritage value(s) of what exists now against the predicted benefits and disbenefits of the proposed intervention; that is to say, the public interest in the historic environment (which, if statutorily protected, is subject to a policy presumption in favour of preservation), with other, usually inter-related, public and private interests. There is rarely a single right answer, so adequate information and adopting a consistent, rigorous process are crucial to reaching publicly-justifiable decisions.

Establish whether there is sufficient information

- 89 Understanding the impacts or consequences of proposed change should go beyond implications that are immediately apparent; for example, how much physical intervention would really be required to implement a proposal or a change of use? Specific investigation is often required, not only of ongoing processes of growth, change and decay, and other factors which may make the significance of the place vulnerable to harm or loss, but also of technical information about all the implications of a potential change, and often of the methods by which it would be achieved.
- 90 Having understood the scope of continuing or proposed change, sufficient information about the values of the elements of the place that would be affected is essential. The general process of assessing values and significance is addressed above (paragraphs 61-65). But detailed, targeted investigation and evaluation may be required, particularly of habitats, and of potential buried archaeological deposits or concealed structure, in order adequately to establish the contribution they make to the significance of the place. If required as part of a statutory process, such research must, however, be directly and proportionately related to the nature of proposal and its potential effects.

Consider the effects on authenticity and integrity

- 91** Evidential value, historical values and some aesthetic values, especially artistic ones, are dependent upon a place retaining (to varying degrees) the actual fabric that has been handed down from the past; but authenticity lies in whatever most truthfully reflects and embodies the values attached to the place (Principle 4.3). It can therefore relate to, for example, design or function, as well as fabric. Design values, particularly those associated with landscapes or buildings, may be harmed by losses resulting from disaster or physical decay, or through ill-considered alteration or accretion. Design value may be recoverable through repair or restoration, but perhaps at the expense of some evidential value. Keeping a large machine, like a water mill or boat lift, in use, may require replacement and modification of structural or moving parts which could be retained if it ceased to operate, producing a tension between authenticity of fabric and function.
- 92** The decision as to which value should prevail if all cannot be fully sustained always requires a comprehensive understanding of the range and relative importance of the heritage values involved (guided by the assessment of significance: paragraphs 82-83), and what is necessary (and possible) to sustain each of them. Retaining the authenticity of a place is not always achieved by retaining as much of the existing fabric as is technically possible.
- 93** A desire to retain authenticity tends to suggest that any deliberate change to a significant place should be distinguishable, that is, its extent should be discernible through inspection. The degree of distinction that is appropriate must take account of the aesthetic values of the place. In repair and restoration, a subtle difference between new and existing, comparable to that often adopted in the presentation of damaged paintings, is more likely to retain the coherence of the whole than jarring contrast.
- 94** Integrity (literally, 'wholeness, honesty') can apply, for example, to a structural system, a design concept, the way materials or plants are used, the character of a place, artistic creation, or functionality. Decisions about recovering any aspect of integrity that has been compromised must, like authenticity, depend upon a comprehensive understanding of the values of the place, particularly the values of what might be lost in the process.
- 95** Every place is unique in its combination of heritage values, so, while it is technically possible to relocate some structures, their significance tends to be diminished by separation from their historic location. There are exceptions, for example public sculpture not significantly associated with its current site, or moving a structure back from an eroding cliff edge, thus recovering its intended relationship with the landform. Relocated structures may also acquire new values in a new location.

Take account of sustainability

- 96** Significant places should be used and managed in ways that will, wherever possible, ensure that their significance can be appreciated by generations to come, an established aspect of stewardship. Sustaining the value of the historic environment as a whole depends also on creating in the present the heritage of the future, through changes that enhance and enrich the values of places. Both objectives involve the difficult task of anticipating the heritage values of future generations, as well as understanding those of our own.
- 97** Sustaining heritage values is likely to contribute to environmental sustainability, not least because much of the historic environment was designed for a comparatively low-energy economy. Many historic settlements and neighbourhoods, tending towards high density and mixed use, provide a model of sustainable development. Traditional landscape management patterns have been sustained over centuries. Many traditional buildings and building materials are durable, and perform well in terms of the energy needed to make and use them. Their removal and replacement would require a major reinvestment of energy and resources.
- 98** The re-use of sound materials derived from the place being repaired or altered is traditional practice and contributes to the sustainable use of energy and material resources. Mixing old and new materials in exposed situations, however, may be inadvisable. Maintaining demand for new traditional and local materials will also stimulate their continued or renewed production, and help to ensure a sustainable supply and the craft skills to utilise it.
- 99** The re-use of sound traditional materials recovered from alteration and demolition elsewhere can also contribute to sustainability, provided they are not derived from degrading other significant places primarily because of the value of their materials.

Consider the potential reversibility of changes

- 100** In reality, our ability to judge the long-term impact of changes on the significance of a place is limited. Interventions may not perform as expected. As perceptions of significance evolve, future generations may not consider their effect on heritage values positive. It is therefore desirable that changes, for example those to improve energy efficiency in historic buildings, are capable of being reversed, in order not unduly to prejudice options for the future.

- I01** However, places should not be rendered incapable of a sustainable use simply because of a reluctance to make modest, but irreversible, changes. It is also unreasonable to take the idea of reversibility to the point that intervention in significant places diminishes their aesthetic values by appearing contrived, awkward or ugly, in order to ensure that it can be undone. Unless of very short duration, crude and intrusive changes are certainly not justifiable simply because they are theoretically temporary or reversible, for they risk becoming permanent.

Compare options and make the decision

- I02** Ideally, proposed changes will cause no harm to any of the values of the place, and the right decision will be obvious. In practice, however, there tend to be options for achieving the objective of proposed change, each of which will have different impacts on values. The predicted long-term or permanent consequences of proposals (in terms of degree, and whether positive, negative or neutral) on each of the identified heritage values of a place, and thus on the significance of the whole, should provide the reasoned basis for a decision, where necessary taking other interests into account.
- I03** Where there are options for the conservation management of change, or reconciling conservation and other interests, 'heritage impact assessment' can be used to compare the predicted effects of alternative courses of action (including taking no action) on the values of a place, in order to identify the optimum solution. The approach can be refined by weighting different values to reflect their relative importance for the place and its significance. Heritage impact assessment can be particularly useful if applied at the conceptual stage of a proposal, and refined at each successive step towards making a decision.

Apply mitigation

- I04** If some negative impact or loss of fabric is unavoidable, mitigation should be considered to minimise harm. This will normally include making records and archiving parts of significant elements, including archaeological deposits, that will be removed or altered prior to and during the work, in accordance with Principles 6.3 and 6.4. A high quality of design of proposed interventions is not mitigation; it is essential in any significant place (Principle 4.6), regardless of any unavoidable harm. Mitigation should not be confused with compensation – non-essential benefits to other aspects of the place, or to other heritage interests.

Monitor and evaluate outcomes

- I05** Monitoring implementation helps to ensure that outcomes reflect expectations. If, despite prior investigation, the unexpected is revealed during implementation, proposals should, so far as is reasonably possible, be amended to minimise harm.
- I06** The management of significant places should include regular monitoring and evaluation of the effects of change, in accordance with Principles 6.1 and 6.2. This provides the basis for action to address ongoing change (including action by authorities to mitigate the effects of deliberate neglect). Outcomes of decisions can be compared with expectations, often revealing unanticipated consequences, and informing future policy and decisions.
- I07** Conservation management plans, regularly reviewed, can provide a sound framework for the management of significant places, particularly those in responsible long-term ownership.

ENGLISH HERITAGE
CONSERVATION
POLICIES AND
GUIDANCE

Preamble

- 108** This section summarises the policies that will guide English Heritage in offering advice or making decisions about particular types of change affecting significant places. More than one type of change may of course be included in any particular proposal. English Heritage is primarily concerned with the effect of proposals on the heritage values of places, and its policies are framed accordingly.
- 109** While some of the policies have a close relationship to particular principles (for example 'New work and alteration' to Principle 4.6), it is important that all the policies are interpreted in the framework of the *Principles* as a whole.
- 110** Tension between conservation and other public policies usually arises from a perceived need to harm the heritage values of a place in order to achieve another important public policy objective, or to sustain the place itself (paragraph 150). The converse is 'enabling development' contrary to public policy, which is proposed in order to sustain a significant place (paragraph 158). In both cases, it is important to keep a sense of proportion, and not automatically to assume that cultural or natural heritage values must prevail over all other public interests. Such tensions are usually best reconciled by integrating conservation with the other public interests through dialogue, based on mutual understanding and respect.

Routine management and maintenance

- 111** **The conservation of significant places is founded on appropriate routine management and maintenance.**
- 112** The values of landscapes and buildings tend to be quickly obscured or lost if long-standing management and maintenance regimes are discontinued. Such regimes are often closely linked to historic design, function and stewardship, and dependent on traditional processes and materials. Since most habitats in England are the result of long-established land management practices, sustaining their ecosystems can depend upon continuing those practices. Reinstating a lapsed regime can help to recover both cultural and natural heritage values.
- 113** Regular monitoring should inform continual improvement of planned maintenance and identify the need for periodic repair or renewal at an early stage. If a permanent solution to identified problems is not immediately possible, temporary works should be undertaken to prevent the problems from escalating. Temporary solutions should be effective, timely and reversible.

Periodic renewal

- I 14** **Periodic renewal of elements of a significant place, intended or inherent in the design, is normally desirable unless any harm caused to heritage values would not be recovered over time.**
- I 15** Periodic renewal, such as re-covering roofs, differs from maintenance in that it occurs on a longer cycle, is usually more drastic in nature and often has a greater visual impact. It involves the temporary loss of certain heritage values, such as the aesthetic value of the patina of age on an old roof covering, or the value of a dying tree as a habitat for invertebrates; but these values are likely to return within the next cycle, provided the replacement is physically and visually compatible (normally 'like for like', to the extent that this is sustainable). By contrast, the consequence of not undertaking periodic renewal is normally more extensive loss of both fabric and heritage values.
- I 16** The justification required for periodic renewal will normally be that the fabric concerned is becoming incapable of fulfilling its intended functions through more limited intervention; and additionally, in the case of landscapes, that succession planting cannot achieve the objective in a less drastic way. Harm to values that will normally be recovered during the next cycle can, in most cases, be discounted, but potential permanent harm cannot be ignored in making the decision.

Repair

- I 17** **Repair necessary to sustain the heritage values of a significant place is normally desirable if:**
- a. **there is sufficient information comprehensively to understand the impacts of the proposals on the significance of the place; and**
 - b. **the long term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future; and**
 - c. **the proposals are designed to avoid or minimise harm, if actions necessary to sustain particular heritage values tend to conflict.**
- I 18** It is important to look beyond the immediate need for action, to understand the reasons for the need for repair and plan for the long-term consequences of inevitable change and decay. While sufficient work should be undertaken to achieve a lasting repair, the extent of the repair should normally be limited to what is reasonably necessary to make failing elements sound and capable of continuing to fulfil their intended functions.

- I19** The use of materials or techniques with a lifespan that is predictable from past performance, and which are close matches for those being repaired or replaced, tends to carry a low risk of future harm or premature failure. By contrast, the longer term effects of using materials or techniques that are innovative and relatively untested are much less certain. Not all historic building materials or techniques were durable – iron cramps in masonry, or un-galvanised steel windows, for example, are both subject to corrosion. Some structural failures are the inevitable, if slowly developing, consequences of the original method of construction. Once failure occurs, stabilising the structure depends on addressing the underlying causes of the problem, not perpetuating inherent faults.
- I20** The use of original materials and techniques for repair can sometimes destroy more of the original fabric, and any decoration it carries, than the introduction of reinforcing or superficially protective modern materials. These may offer the optimum conservation solution if they allow more significant original fabric to be retained. In historic landscapes, planting may need to utilise alternative species, to resist disease or the effects of climate change. Before making decisions, it is essential to understand all the heritage values of the elements concerned, and to consider the longer term, as well as the immediate, conservation objectives.
- I21** Sometimes, the action necessary to sustain or reinforce one heritage value can be incompatible with the actions necessary to sustain others. Understanding the range, inter-relationships and relative importance of the heritage values associated with a place should establish priorities for reconciling or balancing such tensions. While every reasonable effort should be made to avoid or minimise potential conflict, contrived solutions requiring intensive maintenance are likely to be difficult to sustain.

Intervention to increase knowledge of the past

- I22** Intervention in significant places primarily to increase knowledge of the past, involving material loss of evidential values, should normally be acceptable if:
- a. preservation *in situ* is not reasonably practicable; or
 - b. it is demonstrated that the potential increase in knowledge
 - cannot be achieved using non-destructive techniques; and
 - is unlikely to be achieved at another place whose destruction is inevitable; and
 - is predicted decisively to outweigh the loss of the primary resource.

If acceptable, an intervention demands:

- c. a skilled team, with the resources to implement a project design based on explicit research objectives;
 - d. funded arrangements for the subsequent conservation and public deposit of the site archive, and for appropriate analysis and dissemination of the results within a set timetable;
 - e. a strategy to ensure that other elements and values of the place are not prejudiced by the work, whether at the time or subsequently, including conservation of any elements left exposed.
- I23** The historic environment provides a unique record of past human activity, but differs from written archives in that 'reading' some parts of it can only be achieved through the destruction of the primary record. This policy applies particularly to the excavation of buried archaeological deposits, but can be relevant to the physical investigation of structures. It concerns intervention that goes beyond the evaluation and targeted investigation that may be necessary to inform and justify conservation management decisions.
- I24** The continuing development of investigative techniques suggests that, in future, it will be possible to extract more data from excavation and intervention than is currently possible, just as now it is usual to extract much more information than was possible a few decades ago. This demands a cautious approach to the use of a finite resource, and seeking to avoid loss of integrity, but it cannot reasonably exclude all research at a significant place. It must be recognised that much of the evidential value of the primary archive – the place itself – lies in its potential to increase knowledge of the past, to help protect the place and other similar places by a better understanding of their significance, to stimulate research, to encourage the further development of techniques to extract data, and to train successive generations of archaeologists.

- I25** Intervention must be justified primarily by considering the potential gain in knowledge in relation to the impact on the archaeological resource, and specifically on the place or type of site in question. Established, relevant research framework priorities should be taken into account. Intervention should always be the minimum necessary to achieve the research objectives, fully utilising the potential of non-destructive techniques; but also extensive enough to ensure that the full research potential of what is necessarily to be destroyed in the process can be realised.

Restoration

- I26** Restoration to a significant place should normally be acceptable if:
- the heritage values of the elements that would be restored decisively outweigh the values of those that would be lost;
 - the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence;
 - the form in which the place currently exists is not the result of an historically-significant event;
 - the work proposed respects previous forms of the place;
 - the maintenance implications of the proposed restoration are considered to be sustainable.
- I27** Restoration is intervention made with the deliberate intention of revealing or recovering a known element of heritage value that has been eroded, obscured or previously removed, rather than simply maintaining the *status quo*. It may also achieve other conservation benefits, for example restoring a roof on a roofless building may make it both physically and economically sustainable in the long term. Restoration of some elements of a place may be a desirable precursor to the introduction of new work (paragraph I38), which will necessarily take over where the evidence for restoration ends.
- I28** The concept of authenticity (paragraph 91) demands that proposals for restoration always require particularly careful justification. Reinstating damaged elements of work directly created by the hand of an artist normally runs counter to the idea of authenticity and integrity. However, the reinstatement of damaged architectural or landscape features in accordance with an historic design evidenced by the fabric of a place may not do so, if the design itself was the artistic creation, intended to be constructed by others, and the necessary materials and skills are available.
- I29** Mitigation through recording (paragraph I04) is particularly important in restoration work. The results should be integrated with and used to update the initial analysis of the evidence for restoration (which will often be expanded and modified in detail during the early stages of work), and the result deposited in the appropriate Historic Environment Record.

‘The heritage values of the elements that would be restored decisively outweigh the values of those that would be lost.’

- I30** Any restoration inevitably removes or obscures part of the record of past change to a significant place, and so reduces its evidential value, as well as potentially affecting its historical and aesthetic values. Restoration may, however, bring gains by revealing other heritage values, such as the integrity and quality of an earlier and more important phase in the evolution of a place, which makes a particular contribution to its significance. Careful assessment of the values of the elements affected is essential. Where the significance of a place is the result of centuries of change, restoration to some earlier stage in its evolution is most unlikely to meet this criterion.

‘The nature of the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence’.

- I31** Evidence of the evolution of the place, and particularly of the phase to which restoration is proposed, should be drawn from all available sources – from study of the fabric of the place itself (the primary record of its evolution), any documentation of the original design and construction process, and subsequent archival sources, including records of previous interventions. The results of this research and the reasoned conclusions drawn from it should be clearly set out.
- I32** Speculative or generalised re-creation should not be presented as an authentic part of a place: the criteria for new work should apply to its design. But judgement is needed in determining the level of information specific to the place required to justify restoration. For example, reinstatement of an historic garden requires compelling evidence of its planned layout and hard materials, usually based upon or verified by archaeological investigation, and the structure of its planting; but it would be neither essential nor possible to replicate the precise location of every plant once within the garden.

‘The form in which the place currently exists is not the result of an historically-significant event’.

- I33** If a building or structure was ruined or its character fundamentally changed as a consequence of an important historical event, its subsequent state will contribute to its significance: castles slighted in the Civil War, or monastic houses unroofed at the Dissolution, provide examples. In the wake of such episodes, some places were ruined, some cleared away completely, and others repaired and adapted for new purposes. Attempts to restore those exceptional places that have survived as ruins would deny their strong visual and emotional evidence of important historic events. Ruins – real or contrived – can also play a major role in designed landscapes, define the character of places, or be celebrated in art. Even so, their restoration or adaptive re-use may be justified if the alternative is loss.

- I34** The response to dramatic contemporary events which may ultimately come to be seen as historically significant – to memorialise, rebuild or redevelop – tends to be driven by public debate. If the place involved was not previously considered significant, such debate may be regarded solely as part of the event. Physical sustainability and changing values will, however, tend to influence the medium- to long-term future of memorialised ruins of comparatively modern buildings, or the scars of conflict.
- I35** By contrast, neglect and decay, abandonment, including the removal of roofs, crude adaptation for transient uses, accidental fires and similar circumstances are not normally historically-significant events, and subsequent restoration of the damaged parts of the place, even after a long interval, will not fail this test. Retaining gutted shells as monuments is not likely, in most cases, to be an effective means of conserving surviving fabric, especially internal fabric never intended to withstand weathering; nor is this approach likely to be economically sustainable. In such cases, it is appropriate to restore to the extent that the evidence allows, and thereafter to apply the policy for new work (paragraph I38).
- I36** **‘The work proposed respects previous forms of the place’**
The more radical the restoration, the more likely it is to introduce an element of incongruity. The reversal of relatively minor but harmful changes, to restore a place to a form in which it recently existed as a complete entity, is unlikely to contradict this criterion. By contrast, the restoration of isolated parts of a place to an earlier form, except as legible elements of an otherwise new design, would produce an apparently historic entity that had never previously existed, which would lack integrity.
- I37** **‘The maintenance implications of the proposed restoration are considered to be sustainable’**
It is essential to consider the long term implications of a proposed restoration for viability and sustainability. If, for instance, a place or part of it was modified primarily in order to reduce maintenance costs, restoration without considering the increased resources needed for maintenance is likely to be counter-productive. The reinstatement of elaborate parterres in historic gardens is an obvious example, but others can have more serious consequences. For example, reversing a ‘crown flat’ – a flat roof inserted between ridges to eliminate a valley gutter in an historic roof – will lead to rapid decay if the restored valley gutter is not readily accessible and adequately maintained.

New work and alteration

- I38** New work or alteration to a significant place should normally be acceptable if:
- there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;
 - the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;
 - the proposals aspire to a quality of design and execution which may be valued now and in the future;
 - the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.

- I39** The recognition of the public interest in heritage values is not in conflict with innovation, which can help to create the heritage of the future. Innovation is essential to sustaining cultural values in the historic environment for present and future generations, but should not be achieved at the expense of places of established value.

‘The proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed’

- I40** The greater the range and strength of heritage values attached to a place, the less opportunity there may be for change, but few places are so sensitive that they, or their settings, present no opportunities for change. Places whose significance stems essentially from the coherent expression of their particular cultural heritage values can be harmed by interventions of a radically different nature.

- I41** Quality of design, materials, detailing and execution is obviously essential in places of established value. Conversely, places of lesser significance offer the greatest opportunity for the creation of the heritage values of tomorrow, because they have the greatest need of quality in what is added to them. Their potential will only be achieved if all new work aspires to the quality routinely expected in more sensitive places.

‘The proposals aspire to a quality of design and execution which may be valued now and in the future’

- I42** The need for quality in new work applies at every level, from small interventions in an historic room, to major new buildings or developments. Small changes need as much consideration as large ones, for cumulatively their effect can be comparable.

- I43** There are no simple rules for achieving quality of design in new work, although a clear and coherent relationship of all the parts to the whole, as well as to the setting into which the new work is introduced, is essential. This neither implies nor precludes working in traditional or new ways, but will normally involve respecting the values established through an assessment of the significance of the place.
- I44** Quality is enduring, even though taste and fashion may change. The eye appreciates the aesthetic qualities of a place such as its scale, composition, silhouette, and proportions, and tells us whether the intervention fits comfortably in its context. Achieving quality always depends on the skill of the designer. The choice of appropriate materials, and the craftsmanship applied to their use, is particularly crucial to both durability and to maintaining the specific character of places.
- ‘The long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future’**
- I45** New work frequently involves some intervention in the existing fabric of a place, which can be necessary to keep it in or bring it back into use. A ‘presumption in favour of preservation’ (doing no harm), even preservation of evidential value, does not equate to a presumption against any intervention into, or removal of, existing fabric; but such interventions require justification in terms of impacts on heritage values.
- I46** There are limits, however; beyond which loss of inherited fabric compromises the authenticity and integrity of a place. At the extreme, a proposal to retain no more than the façade of an historic building attached to a modern structure must be considered in the light of an assessment of the existing values of the building, both as a whole and in its elements. The relationship between the façade and the existing and proposed structures behind will be crucial to the decision, but retaining the façade alone will not normally be acceptable.
- I47** Changes designed to lessen the risk or consequences of disaster to a significant place require a balance to be struck between the possibility of major harm to heritage values without them, and the certainty of the lesser, but often material, harm caused by the works themselves. The need for physical precautions should be considered as part of disaster response and recovery planning for the place as a whole, based on risk assessment and management requirements, and any statutory duties. All options should be evaluated, including improved management as an alternative to, or in conjunction with, lower levels of physical intervention.

- 148** As with repair, the use in interventions of materials and techniques proven by experience to be compatible with existing fabric, including recycled material from an appropriate source (paragraphs 98-99), tends to bring a low risk of failure. Work which touches existing fabric lightly, or stands apart from it, brings progressively greater opportunity for innovation. Energy efficiency (in production as well as use), sustainable sourcing of materials, and environmental good practice should guide all new work, but not to the extent of causing harm to the heritage values of the place.

Integrating conservation with other public interests

- 149** Changes which would harm the heritage values of a significant place should be unacceptable unless:
- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;
 - b. there is no reasonably practicable alternative means of doing so without harm;
 - c. that harm has been reduced to the minimum consistent with achieving the objective;
 - d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering
 - its comparative significance,
 - the impact on that significance, and
 - the benefits to the place itself and/or the wider community or society as a whole.
- 150** The integration of heritage and other environmental interests with economic and social objectives at every level of strategic planning – national, regional, local – helps to minimise conflict. A willingness to consider and compare the impacts on the significance of a place of a range of options to achieve the public objective concerned is essential, as is selecting an option that either eliminates, or (as far as is possible) mitigates harm. This will often involve those representing heritage interests in employing the skills necessary critically to appraise the case and options for development, as well as its promoters employing the skills needed to evaluate heritage implications. The heritage case should be put fully and robustly.
- ‘Comparative significance’**
- 151** The greater the significance of a place to society, the greater the weight that should be attached to sustaining its heritage values. This concept of ‘proportionality’ (Principle 5.4) relies on judgement rather than formulae, but is fundamental to equitable reconciliation of the public interest in heritage with other public and private interests.

- I52** Since statutory designation, at local as well as national level, is a clear indicator of the significance of a place, the fact of designation can itself play a vital role in guiding options for strategic change. The absence of designation, however, does not necessarily mean that a place is of low significance (paragraphs 79, 81). The weight to be attached to heritage values relative to other public interests should not be considered until those heritage values have been properly evaluated, assessed against current criteria and, if they meet them, safeguarded by designation.
- ‘Impact on significance’**
- I53** The assessment of the degree of harm to the significance of a place should consider the place as a whole and in its parts, its setting, and the likely consequences of doing nothing. In the case of a derelict historic building, for example, should a viable, but modestly damaging, proposal be refused in the hope that a better or less damaging scheme will come forward before the place reaches the point of no return? In such circumstances, the known or predicted rate of deterioration is a crucial factor, and hope must be founded on rational analysis. The potential availability of subsidy as an alternative to harmful change, or to limit its impact, should be considered. The fact that a place is neglected should not, of itself, be grounds for agreeing a scheme that would otherwise be unacceptable.
- ‘Benefits to the place’**
- I54** Quite minor changes, for example to meet the duties to make ‘reasonable adjustments’ under the Disability Discrimination Act 1995, or accommodate changing liturgy in a church, may keep a place fit for use. This in turn can make a place sustainable by maintaining its market value, or allowing its continued use by a community. Any changes that would cause harm to the heritage values of the place should obviously be limited to what is necessary to sustain it in use, and their impacts mitigated so far as possible. However, a high quality of design of proposed interventions is not mitigation, but essential in any significant place (Principle 4.6), and offers of compensation should not make harmful proposals more acceptable (paragraph 104).
- ‘Benefits to the wider community or society as a whole’**
- I55** These assessments are broader and more complex than those concerned only with the gains and losses for the heritage values of a place. The underlying considerations should always be proportionality and reasonableness: whether, in relation to the place or society, the predicted benefits of change outweigh the residual, unavoidable harm that would be done to the significance of the place. The balance lies between retaining significance – the sum of the heritage values ascribed at the point of change to something which, if lost, cannot be replaced – and the predicted, and potentially short-term, benefits of development. The benefits, including those of strategies to mitigate and adapt to climate change, need to be subject to scrutiny in proportion to their impact on heritage values.

156 Reconciling conservation and other public objectives can be most difficult when the heritage values of a significant place, often an archaeological site or an historic building, must be compared with the potential of a replacement to enhance the place because of its allegedly greater cultural value. Subjective claims about the architectural merits of replacements cannot justify the demolition of statutorily-protected buildings.¹⁰ There are less clear-cut situations, however, in which it is proposed to replace a building or develop a place of modest, but positive, heritage value with one that is claimed to be of much greater architectural quality, or where such a proposal would affect the setting of a significant place. Its supporters claim net enhancement, while its opponents claim absolute harm to the heritage values of the place. Each is making a value-based judgement, but choosing to attach different weights to particular values. If such positions are maintained, the choice is ultimately a political one, or for decision at public inquiry.

Enabling development

157 Enabling development that would secure the future of a significant place, but contravene other planning policy objectives, should be unacceptable unless:

- a. it will not materially harm the heritage values of the place or its setting
- b. it avoids detrimental fragmentation of management of the place;
- c. it will secure the long term future of the place and, where applicable, its continued use for a sympathetic purpose;
- d. it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid;
- e. sufficient subsidy is not available from any other source;
- f. it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests;
- g. the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.

158 Enabling development is development that would deliver substantial benefit to a place, but which would be contrary to other objectives of national, regional or local planning policy. It is an established planning principle that such development may be appropriate if the public benefit of rescuing, enhancing, or even endowing a significant place decisively outweighs the harm to other material interests. Enabling development must always be in proportion to the public benefit it offers.

¹⁰ This is currently stated as government policy in PPG 15, *Planning and the historic environment* (1994) at paragraph 3.19 (iii).

- 159** If it is decided that a scheme of enabling development meets all the criteria set out above, planning permission should be granted only if:
- a. the impact of the development is precisely defined at the outset, normally through the granting of full, rather than outline, planning permission;
 - b. the achievement of the heritage objective is securely and enforceably linked to the enabling development, bearing in mind the guidance in ODPM Circular 05/05, *Planning obligations*;
 - c. the place concerned is repaired to an agreed standard, or the funds to do so made available, as early as possible in the course of the enabling development, ideally at the outset and certainly before completion or occupation; and
 - d. the planning authority closely monitors implementation, if necessary acting promptly to ensure that obligations are fulfilled.

CONCLUSION

Applying the *Principles*

- 160** These *Conservation Principles, Policies and Guidance* build on earlier statements and experience, to formalise an approach which takes account of a wide range of heritage values. They are intended to help everyone involved to take account of the diverse ways in which people value the historic environment as part of their cultural and natural heritage. They acknowledge that the cultural and natural heritage values of places, including those reflected in landscape designations, should be managed in parallel, fostering close working relationships between cultural and natural heritage interests.
- 161** Balanced and justifiable decisions about change in the historic environment depend upon understanding who values a place and why they do so, leading to a clear statement of its significance and, with it, the ability to understand the impact of the proposed change on that significance.
- 162** Every reasonable effort should be made to eliminate or minimise adverse impacts on significant places. Ultimately, however, it may be necessary to balance the public benefit of the proposed change against the harm to the place. If so, the weight given to heritage values should be proportionate to the significance of the place and the impact of the change upon it.
- 163** The historic environment is constantly changing, but each significant part of it represents a finite resource. If it is not sustained, not only are its heritage values eroded or lost, but so is its potential to give distinctiveness, meaning and quality to the places in which people live, and provide people with a sense of continuity and a source of identity. The historic environment is a social and economic asset and a cultural resource for learning and enjoyment.
- 164** Although developed primarily to guide the activities of English Heritage staff, we therefore commend these *Principles, Policies and Guidance* for adoption and application by all involved with the historic environment and in making decisions about its future.

DEFINITIONS

This section includes words used in a specific or technical sense. The *Oxford English Dictionary* definition otherwise applies.

Alteration

Work intended to change the function or appearance of a place

Authenticity

Those characteristics that most truthfully reflect and embody the cultural heritage values of a place¹¹

Conservation

The process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations

Conservation area

'An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance', designated under what is now s69 of the Planning (Listed Buildings and Conservation Areas) Act 1990

Context

Any relationship between a place and other places, relevant to the values of that place

Designation

The recognition of particular heritage value(s) of a significant place by giving it formal status under law or policy intended to sustain those values

Fabric

The material substance of which places are formed, including geology, archaeological deposits, structures and buildings, and flora

Harm

Change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a place

Heritage

All inherited resources which people value for reasons beyond mere utility

Heritage, cultural

Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others

Heritage, natural

Inherited habitats, species, ecosystems, geology and landforms, including those in and under water, to which people attach value

Historic environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible or buried, and deliberately planted or managed flora

Historic Environment Record

A public, map-based data set, primarily intended to inform the management of the historic environment

Integrity

Wholeness, honesty

Intervention

Any action which has a physical effect on the fabric of a place

Maintenance

Routine work regularly necessary to keep the fabric of a place in good order

Material

Relevant to and having a substantial effect on, demanding consideration

Natural change

Change which takes place in the historic environment without human intervention, which may require specific management responses (particularly maintenance or periodic renewal) in order to sustain the significance of a place

¹¹ This definition is based on *The Nara Document on Authenticity* (ICOMOS 1994)

Object

Anything not (now) fixed to or incorporated within the structure of a place, but historically associated with it

Place

Any part of the historic environment, of any scale, that has a distinctive identity perceived by people

Preserve

To keep safe from harm¹²

Proportionality

The quality of being appropriately related to something else in size, degree, or other measurable characteristics

Public

Of, concerning, done, acting, etc. for people as a whole

Renewal

Comprehensive dismantling and replacement of an element of a place, in the case of structures normally reincorporating sound units

Repair

Work beyond the scope of maintenance, to remedy defects caused by decay, damage or use, including minor adaptation to achieve a sustainable outcome, but not involving restoration or alteration

Restoration

To return a place to a known earlier state, on the basis of compelling evidence, without conjecture

Reversible

Capable of being reversed so that the previous state is restored

Transparent

Open to public scrutiny

Setting

The surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape

Significance [of a place]

The sum of the cultural and natural heritage values of a place, often set out in a statement of significance

Significant place

A place which has heritage value(s)

Sustain

Maintain, nurture and affirm validity

Sustainable

Capable of meeting present needs without compromising ability to meet future needs

Value

An aspect of worth or importance, here attached by people to qualities of places

Value, aesthetic

Value deriving from the ways in which people draw sensory and intellectual stimulation from a place

Value, communal

Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory

Value, evidential

Value deriving from the potential of a place to yield evidence about past human activity

Value, historical

Value deriving from the ways in which past people, events and aspects of life can be connected through a place to the present

Value-based judgement

An assessment that reflects the values of the person or group making the assessment

¹² The legal interpretation established in *South Lakeland DC v Secretary of State for the Environment and Rowbotham* [1991] 2 L.P.R. 97

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Historic England

Conservation Area Designation, Appraisal and Management

Historic England Advice Note 1



Summary

This revised guidance sets out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management. It is intended to offer advice to all those involved in managing conservation areas so that the potential of historic areas worthy of protection is fully realised, the need for community and owner consultation examined, and the benefits of management plans to manage change, and achieve regeneration and enhancement, fully exploited. Advice on appraisal of conservation areas is also given, as assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.

It is one of a series of Historic England Advice Notes

<https://www.historicengland.org.uk/advice/planning/planning-system/>

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Front cover:

Berwick upon Tweed - general view from Spittal showing riverside walls

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Introduction

- 1 The purpose of this Historic England Advice note is to provide information on conservation area designation, appraisal and management to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment legislation, the policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.
- 2 The advice in this document, in accordance with the NPPF, emphasises that work in designating, appraising and managing conservation areas should be no more than is necessary, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those carrying out this work need enough information to understand the issues (NPPF, paragraph 192). This is particularly important in light of the policy in paragraph 127 of the NPPF, alerting local planning authorities to ensure that conservation area designation is justified.
- 3 The contribution that historic areas make to our quality of life is widely recognised. They are a link to the past that can give us a sense of continuity and stability and they have the reassurance of the familiar which can provide a point of reference in a rapidly changing world. The way building traditions and settlement patterns are superimposed and survive over time will be unique to each area. This local distinctiveness can provide a catalyst for regeneration and inspire well designed new development which brings economic and social benefits which are valued by both local planning authorities and local communities in the almost 10,000 conservation areas which have been designated.
- 4 Change is inevitable, however, not necessarily harmful and often beneficial, and this guidance sets out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management. Conservation areas can contribute to sustainable development under the NPPF in all its three dimensions (NPPF, paragraph 7). However, 497 conservation areas were judged by English Heritage in 2014 to be at risk through inappropriate new development, neglect or deliberate damage (the gathering of local authority information on conservation areas at risk has provided information on over 80% of conservation areas in England).
- 5 This Historic England Advice note supersedes *Understanding Place: Conservation Area Designation, Appraisal and Management: English Heritage Guidance* (2011).

1 Designation

Protection Offered by Designation as a Conservation Area

- 6 Conservation area designation introduces controls over the way owners can alter or develop their properties. However, owners of residential properties generally consider these controls to be beneficial because they also sustain, and/or enhance, the value of property within it. This has been confirmed by recent research by the London School of Economics; see G Ahlfeldt, N Holman and N Wendland, *An Assessment of the effects of Conservation Areas on Value*, London School of Economics, 2012 - <https://historicengland.org.uk/research/current-research/social-and-economic-research/role-and-impact-of-heritage/value-conservation-areas/>.
- 7 These controls include:
- the requirement in legislation and national planning policies to preserve and/or enhance - see Planning Practice Guidance: Conserving and Enhancing the Historic Environment, paragraphs 002 (reference ID:18a-002-20140306); 025 (reference ID: 18a-025-20140306); 047 (reference ID: 18a-047-20140306)
 - local planning policies which pay special attention to the desirability of preserving or enhancing the character or appearance of the area
 - control over demolition of unlisted buildings
 - control over works to trees
 - fewer types of advertisements which can be displayed with deemed consent
 - restriction on the types of development which can be carried out without the need for planning permission (permitted development rights)

Identifying Potential in Conservation Areas

- 8 Conservation areas may be identified in a number of ways, including:
- Historic characterisation studies in response to development proposals, for master-planning and as part of evidence collection for the local development plan
 - Local communities working on neighbourhood plans may identify areas which have a special interest to them but with historic associations previously not understood
- 9 Paragraph 127 of the NPPF cautions local planning authorities to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest.
- 10 Further to the reasons given in the PPG as to their usefulness, regular reviews may also highlight areas where de-designation may be necessary through degradation of all or part of the conservation area (see paragraph 18 for boundary revision in such cases). With appropriate management procedures in place, the character and appearance of a conservation area should not change rapidly and the review might typically result in an addendum to the existing appraisal, recording:
- what has changed
 - confirming (or redefining) the special interest that warrants designation
 - setting out any new recommendations; and
 - revising the management strategy. The updated appraisal and related management proposals can then be re-adopted by the local authority

Significance and Conservation Areas

- 11 The different types of special architectural and historic interest which have led to designation 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
 - Areas designated because 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 Register of parks and gardens of special historic interest
- 12 Conservation area designation is not generally an appropriate means of protecting the wider landscape (agricultural use of land falls outside the planning framework and is not affected by designation as a conservation area) but it can protect open areas particularly where the character and appearance concerns historic fabric, to which the principal protection offered by conservation area designation relates.
- 13 A designation made solely to protect veteran trees is unlikely to meet the criteria of special architectural or historic interest as set out in the NPPF, and Tree Preservation Orders (TPOs) would be a more appropriate route for protection. Veteran trees may be a more problematic aim because the criteria for TPOs generally exclude trees which are 'dead, dying or dangerous'.

Community and Owner Consultation and Involvement

14 Local communities may be involved in many ways with conservation areas, not only by consultation of both communities and owners, obviously important in achieving support, and by proactive assistance in identifying the general areas that merit conservation area status and defining the boundaries, therefore adding depth and a new perspective to the local authority view. Communities can also

- undertake a great deal of the initial survey work, particularly where appraisals are initiated by local groups; and
- from their survey data, they can help the local authority develop a full appraisal in draft form

Historic England has recently published advice on heritage content of community-led plans in rural areas (<https://content.historicengland.org.uk/images-books/publications/knowning-your-place/knowning-your-place12.pdf/>) and has funded the development of a toolkit currently being used in Oxford to assist groups of local residents to evaluate the heritage within their area (<http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>).

15 Publishing the draft appraisal on the council's website, accompanied by an electronic comments sheet/feedback form involves the wider community before the appraisal is too far advanced to exclude further influence on the outcome. It is good practice to include a report in the appraisal explaining:

- how community involvement and public consultation has been undertaken
 - how the input from the community was evaluated; and
 - how it has influenced the definition of special interest and the recommendations
- 16** Under section 70(8) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in addition to notifying the Secretary of State and Historic England, a local planning authority is required to publicise the intention to designate by a notice placed in the London Gazette and a local newspaper. The local authority must follow the same publicity procedures to vary or cancel a designation as required to designate. Involving the community at an early stage is advisable.

Finalising and Reviewing the Conservation Area Boundary

- 17** Before finalising the boundary it is worth considering whether the immediate setting also requires the additional controls that result from designation, or whether the setting is itself sufficiently protected by national policy or the policies in the Local Plan.
- 18** The special interest of areas designated many years ago may now be so eroded by piecemeal change or by single examples of poorly designed development that parts of the area may no longer have special interest. In such cases, boundary revisions will be needed to exclude them or, in exceptional circumstances, reconsideration of the conservation area designation as a whole. Conversely, the existing boundary may have been drawn too tightly, omitting areas now considered of special interest such as historic rear plots with archaeological potential, later phases of development (such as more recent housing), or parks, cemeteries and historic green spaces. In such cases the existing boundary may need to be extended.

Appraisal and Review

Benefits of appraisal

- 19 A character appraisal of an area undertaken prior to designation will have the following benefits, both before and after designation:
- As a tool to demonstrate the area's special interest
 - As explanation to owners, businesses and inhabitants of the reasons for designation
 - As educational and informative documents created with the local community, expressing what the community particularly values about the place they live and work in
 - Greater understanding and articulation of its character which can be used to develop a robust policy framework for planning decisions
 - Informing those considering investment in the area in guiding the scale, form and content of new development
 - When adopted it will be material to the determination of planning appeals and to Secretary of State decisions, including those where urgent works are proposed to preserve an unlisted building in a conservation area
 - Assistance in developing a management plan for the conservation area by providing the analysis of what is positive and negative, and in opportunities for beneficial change and enhancement or the need for additional protection and restraint (including the use of Article 4 directions)
 - Better understanding of archaeological potential, perhaps by identifying and mapping archaeologically sensitive areas and thus guiding development towards less sensitive locations

- 20 It is important to bear in mind that designation in itself will not protect an area from incremental change which can erode its character. Where appraisals have not been reviewed for some time, the special interest of the area may have changed or been diluted.

Preparation of the Appraisal and Review

- 21 Ideally, an appraisal will have been prepared prior to designation of all conservation areas or extensions to existing conservation areas in order to inform the designation process. The appraisal can then be reviewed regularly as part of the management of the conservation area, and can be developed into a management plan.

2 Managing Change in Conservation Areas

Managing Change through a Management Plan

22 Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places on local planning authorities the duty to draw up and publish proposals for the preservation and enhancement of conservation areas in their districts. Regularly reviewed appraisals identifying threats and opportunities can be developed into a management plan, which can in turn channel development pressure to conserve the special quality of the conservation area. Both areas in relative economic decline and those under pressure for development can benefit from management opportunities that promote beneficial change.

Involving Others

23 Proposals for conservation and enhancement will be most effective when all the departments within the local authority understand the significance of designation and work corporately to ensure that development decisions respect the historic context.

24 Section 71 of the Act requires the local authority to submit the proposals for consideration to a public meeting in the area to which they relate. There are major advantages, particularly in public support, in encouraging owners, residents' groups, amenity groups, businesses and community organisations to discuss the issues facing the area and how these might be addressed. Management plans, like appraisals, which are drawn up without effective consultation are likely to be misunderstood and ineffective.

25 Guidance (both printed and available online) which explains why the area has been designated, what constraints and opportunities result from designation (including restrictions on permitted development, the need for consent for demolition of buildings over 115 cubic metres and the need to give prior notice before undertaking works to trees) and what policies the local authority has adopted will help home owners, businesses and developers understand how the community wants the area to develop.

26 It is also important that utility companies, statutory undertakers and the highway authority are engaged from designation through to drawing up and implementing management proposals, as the character and appearance of conservation areas is often related to the treatment and condition of roads, pavements and public spaces and traffic management generally.

Generic Management Plans

27 Within a local authority area there may be a number of similar conservation areas. Development of a generic plan which can be adapted for individual conservation areas by inserting specific actions can maximise the use of resources in a proportionate way. The following sections relate to suggested components of a generic management plan.

Local Planning Policies

28 It is very helpful if the proposals map shows boundaries of existing conservation areas and changes/new designations when updated.

- The Local Plan would indicate where conservation objectives are key priorities and why and how those conservation objectives are to be integrated with social, economic and other environmental objectives

- Where there are gap sites or negative contributors within a particular conservation area, a Local Plan/area action plan may include specific proposals for new development while Article 4 directions may prevent further incremental loss

- Development management policies might include policies on:
 - protection of important views and vistas
 - criteria for demolition and replacement buildings
 - alterations and extensions to historic buildings
 - an urban design strategy for securing good design quality in new development
 - development/design briefs for key sites
 - development opportunities for sensitive developments within the conservation area

29 Protecting the character or appearance of an area will often be more effective if a flexible approach is taken to the requirements of the Building Regulations (Historic England advice on energy efficiency and historic buildings, for instance, can be found at <https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/eehb-partl.pdf>). Similar flexibility is needed in compliance with the Equalities Act 2010 and the Fire Precautions Act 1971, and highway policies where they would be in conflict with the preservation or enhancement of the area's character or appearance. However, through adaptation to provide inclusive access, for instance, may come long term beneficial use.

30 The Local Plan annual monitoring report will assess progress with the implementation of the management plan and the extent to which planning policies in the local development documents, including policies for the historic environment, are being complied with or are effective in delivering community aspirations. The assessment can then be used to modify and update policies and programme. Monitoring could also include following up and publishing information from time to time on the local authority's progress with implementing the proposals included in the management strategy for the area.

Guidance

- 31 General guidance can be developed quite easily from the appraisal. It might cover:
- controls, limitations and opportunities for enhancement including local plan policies (see paragraph 28)
 - topics relevant to conservation areas, such as retail policies
 - specific issues such as replacement windows and doors
 - parameters for extensions
 - design of shop fronts including the use of security shutters
 - outdoor advertisements
 - controls on permitted development (including Article 4 directions)
- 32 Site-specific design guidance and development briefs will encourage new development that complements the established grain, settlement pattern and character, while making a positive contribution to the significance of the conservation area. Such guidance is particularly useful where the character of the area derives from its diversity, where imitative or ‘in keeping with existing’ styles would run counter to the way in which the area has traditionally evolved.

Regeneration Strategy

- 33 Having identified in the appraisal the scale of the problem and priorities for action, a regeneration strategy to focus economic activity and development in the areas where it can be of most benefit would:
- be based on thorough analysis of prevailing problems in the designated area; and
 - include the causes of under-use and fabric decay and realistic economic and valuation advice.
- 34 A more detailed assessment of the major structural and external elements of some or all of the buildings in the area may be needed to estimate the cost of bringing the physical fabric back into good repair. The availability of grant-aid will clearly be important. Further advice is available at <https://www.historicengland.org.uk/services-skills/grants/our-grant-schemes> and <http://www.hlf.org.uk/looking-funding/our-grant-programmes/townscape-heritage>, and in the Heritage Alliance Heritage Funding Directory (HFD) at <http://www.theheritagealliance.org.uk/fundingdirectory/main/fundinghome.php>.
- 35 Consideration might be given to initiatives which bring empty upper floors back into use within town centres, to help sustain activity within the area, as well as a strategy for the repair and restoration of architectural features to buildings.

Enhancement Schemes

- 36 Environmental improvements can be achieved through the following:
- the removal of negative factors such as obtrusive hoardings and unsightly poles and overhead wires and other matters noted in the conservation area appraisal
 - sympathetic landscaping and planting
 - the use of a Section 215 notice on the owner (or occupier) of any land or building whose condition is adversely affecting the amenity of the conservation area; and
 - the retention of features of local interest to maintain local character

Environmental Strategies

- 37 Audits and strategies can assist the management of conservation areas by ensuring that change enhances rather than harms them. Such initiatives include:
- **Highway signage and street furniture**
A detailed audit of the public realm to identify the best way to minimise physical obstruction and visual clutter and integrate new signs or street furniture in the design of the street as a whole (the Streets for All regional manuals show how streets can be managed to retain and enhance local character. Associated case studies give practical advice on solving common highway problems such as fixing signs and lights to buildings, and removing yellow lines).
 - **Traffic management**
Early engagement with highways departments can help to identify sympathetic traffic management designs and street lighting, thereby ensuring that any future programme of highway works brings about positive benefits for the conservation area even where there is no immediate budget for highways interventions (Manual for Streets 2 - <https://www.gov.uk/government/publications/manual-for-streets-2> -provides guidance on highway safety and street and road design which considers historic context). Statutory undertakers are responsible for carrying out the permanent reinstatement of the highway where they disturb it with the existing materials, or in the closest possible match, if the materials cannot be re-used.

■ Tree strategies

A good tree strategy will assess the amenity value of trees on private land, before there is pressure to remove them through the tree notification process, as well as suggest a proactive replacement programme for trees on public land so that successor trees are planted ready to replace those that are becoming diseased, dying or dangerous. The strategy could also usefully include measures to ensure trees are protected, and their growing environment enhanced, if opportunities arise during street works or other developments.

■ Open space and green infrastructure strategies

Such strategies help local authorities to plan and manage open space, both public and private, itself valuable green infrastructure assisting the adaptation and mitigation of climate change.

■ Conservation management plans

Conservation plans are recommended for individual historic gardens, parks and cemeteries.

■ Enforcement and remediation strategy

Regular monitoring of changes in the appearance and condition of a conservation area allows prompt action to be taken to deal with problems as they arise. Similarly, a dated photographic record created during the appraisal process will help with any later enforcement action. An Enforcement and Remediation Strategy giving priorities for intended action to secure repairs to, and full use of, buildings at risk in the conservation area will be informed by a detailed survey of building condition and occupancy (collection of local authority information on conservation areas at risk has provided information on over 80% of conservation areas).

38 It is advisable for local authorities to use their statutory powers if unlisted buildings that contribute positively to the special interest of a conservation area are falling into decay and where use of the powers would be a positive step. Information on serving urgent works and repairs notices is available in Historic England's step-by-step advice, *Stopping the Rot* (<https://content.historicengland.org.uk/images-books/publications/stoppingtherot/acc-stopping-the-rot-guidance.pdf/>); neglect and enforcement are also mentioned in GPA 2 – *Managing Significance in Decision-Taking in the Historic Environment*, paragraphs 45-48 (<http://www.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>).

3 Appraisal of Conservation Areas

Introduction

39 The benefits of appraisal have been set out in paragraph 19 of this advice note and this section gives further details. This need not be an overly long or costly task. The objective is to understand and articulate exactly why the area is special and what elements within the area contribute to this special quality and which don't, conveying this succinctly and in plain English, accessible to all users. With scarce resources it may be better to complete appraisals for several conservation areas in reasonable detail rather than in full detail for one conservation area.

Research

40 The techniques for tracing the historic development of an area and assessing the condition of the historic environment and heritage assets within it are set out in *Understanding Place: Historic Area Assessments in a Planning and Development Context* (<https://content.historicengland.org.uk/images-books/publications/understanding-place-planning-develop/understanding-place-haa-planning-dev-context.pdf>) and in greater detail in *Understanding Place: Historic Area Assessment: Principles and Practice* (<https://content.historicengland.org.uk/images-books/publications/understanding-place-principles-practice/understanding-place-haa.pdf>). The following issues will be

of particular relevance to the analytical framework of an appraisal:

- current and past land use
- communication types and patterns
- social and economic background
- aspect, geology and relief
- distribution, type and condition of designated and non-designated heritage assets
- density, types and forms of buildings, gardens and green spaces
- place names and earliest references

41 Documentary and other sources might include:

- Ordnance Survey and other maps
- trade directories
- the [Historic England Archive](#)
- aerial photographs
- historic environment record (HER) data
- historic characterisation studies

Further information on using these sources can be found in section 4.4 of *Understanding Place: Historic Area Assessment: Principles and Practice*.

Presentation

42 Graphic presentation is both immediate and far more accessible for users; it usually results in a more succinct document. Where issues cannot easily be presented graphically, complementary text is necessary. Aside from photographs or drawings of buildings and characteristic local details, it is useful to include maps or sketches showing the following:

- the conservation area in its wider setting, whether within a larger settlement, or in the context of a rural landscape hinterland
- the area's historical development, also identifying places or buildings with particular historic associations
- current uses, for example, related to different historic building types (residential, commercial, industrial)
- townscape analysis: for example, spatial issues such as important views into and out of the conservation area, landmarks, and open or green spaces; or temporal issues, including pre-urban landscape features (such as the lines of former field boundaries) which survive in the current townscape
- designated and undesignated heritage assets, including buildings of townscape merit and unlisted buildings or groups of buildings that contribute positively to the character or appearance of the area, scheduled monuments and areas of archaeological interest (this could be combined with the townscape analysis map, depending on the size and complexity of the area)

Adoption

43 Following consultation and revision of the appraisal and the resulting management proposals to take account of public responses, they can be adopted formally in accordance with the local authority's internal procedures (many authorities find a single A4 summary sheet for each conservation area a useful addition to the full document).

44 Adoption of the appraisal as part of the Local Plan is a matter for the local planning authority; some authorities have adopted appraisals and management plans together as Supplementary Planning Documents (SPD) (see <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/supplementary-planning-documents>) whereas others regard the appraisal itself as part of the evidence base and adopt the management plan including development management policies in the Local Plan as SPD. Planning inspectors have accepted appraisals as material considerations of considerable weight in appeals whether or not they have been adopted as SPD.

Content

45 The content suggested below can be adapted to suit local circumstances.

■ Introduction

Explains

- the background to the appraisal
- describes the general identity and character of the conservation area and when it was designated
- its place within the wider settlement or surrounding landscape
- the scope and nature of the appraisal, and
- the dates of survey, adoption and publication
- Any significant sources of information might also be mentioned

■ Planning Policy Context

To provide a context for the appraisal, the national and local policy framework is useful as well as a brief explanation of what a conservation area is, how and why it is designated, a summary of the implications of designation for members of the community looking at the appraisal for the first time and information about the public consultation.

■ The Definition (or Summary) of Special Interest

If character areas or zones have been identified these will be described in detail and the special interest of each area evaluated further on in the document but the sum of these values can be articulated in this section. The values attributed to the area by the local community and all those with a stakeholder interest (ideally through

involvement at the earliest stages and at the very least through the formal consultation) will be an important consideration. Key elements in defining the special interest are likely to be:

- the relationship of the conservation area to its setting and the effect of that setting on the area
- the still-visible effects/impact of the area's historic development on its plan form, character and architectural style and social/historic associations
- how the places within it are experienced by the people who live and work there and visitors to the area (including both daily and seasonal variations if possible)
- architectural quality and built form
- open spaces, green areas, parks and gardens, and trees
- designated and other heritage assets, their intrinsic importance and the contribution they make to the townscape
- local distinctiveness and the sense of place which make the area unique.

46 Some authorities, such as the Yorkshire Dales National Park Authority, have developed their own templates to use which can be a useful tool when carrying out a number of appraisals over a short time: see <http://www.yorkshiredales.org.uk/living-and-working/historic-buildings/conservation-areas/careview-farfieldmill-full-final.pdf>.

Ways to assess these elements are described in more detail below.

Assessing Special Interest

Location and setting

47 Any historic landscape characterisation coverage will assist with this part of the appraisal (<https://historicengland.org.uk/research/approaches/research-methods/characterisation-2/>). General character and plan form need to be described, e.g. linear, compact, dense or dispersed. Where the conservation area only covers part of a village, town or city, it is helpful to include the geographical and historical context in relation to the character and appearance of the whole settlement as well as a factual description of the location of the conservation area and its wider setting and brief references to economic profile, general condition and existing or potential forces for change.

48 The following may be significant contributors to character:

- Views of rivers, the sea and surrounding hills and glimpses of landscape from urban streets
- open spaces, church towers and prominent public buildings
- a uniform building height resulting either from past influences or planning restrictions
- distant views of the settlement and those in the approach to it may also contribute
- adjacent designations such as Areas of Outstanding Natural Beauty (AONBs) or Areas of High Landscape Value, where penetrating or abutting the built-up area, should also be noted and explained

Historic development

49 Map regression (comparing successive historic maps, including the Ordnance Survey sequence) is a starting point for historical analysis, and archaeological and urban morphological methods can help to

reconstruct the earlier stages of historical development, often still influencing the current townscape (paragraph 2.32 of *Understanding Place: Historic Area Assessment: Principles and Practice* gives useful questions about the historic development of an area).

50 Though some conservation areas are made up largely or even entirely of C20 development (e.g. Letchworth and Welwyn Garden Cities), the twentieth century is often the most undervalued and vulnerable period of building and landscaping and it will be important for the appraisal to recognise, where appropriate, the contribution made by more recent buildings.

51 Once this analysis has been completed the results can be shown on a map which illustrates key periods in the area's history and highlights the survival of those historic elements which have determined the form of the conservation area today (for instance, a medieval road pattern, former defensive lines, watercourses, canals, railways, burgage plots or other significant boundaries, estate walls, formal layouts, and the relationship of buildings to open spaces). Supporting text can summarise how the settlement has developed and a list of books and other sources describing local history may be helpful.

52 Information on historic associations from the museum, record office or local library may also be important and local knowledge can be as valuable as formal records for relatively modern settlements.

53 Archaeological remains, whether above ground structures, earthworks, or buried deposits, often contribute directly to sense of place as well as representing a potential resource for research, interpretation and education. Mention in the appraisal and management plan may be useful both as information for developers and for their

conservation and protection. Historic characterisation approaches such as intensive or extensive urban surveys (see *Understanding Place: An Introduction*) provide useful further information, usually held in the local HER. To identify archaeological potential, it may be helpful to include a map or deposit model showing archaeologically sensitive areas.

Architectural quality and built form

- 54 Here describe any dominant architectural styles, the prevalent types and periods of buildings, their status (i.e. nationally designated or locally listed) and essential characteristics, and their relationship to the topography, street pattern and/or the skyline. Individual buildings or groups that contribute positively to the character or appearance of the area and those that are distinctive, because they are rare or unique, can be identified on a map. The range of traditional roofing, walling and surface materials in the area may be characteristic of the local vernacular and it will be important to note the textures and colours and the ways in which they have been used. Surviving historic surfaces and historic or unusual street furniture are likely to contribute to character and special interest.
- 55 Surviving or former uses within the area might also have influenced plan form, urban grain and building types, for example grand terraces with mews, villas set in generous gardens, workers' back-to-back housing or industrial buildings connected with particular activities, local trades or specialised markets. The influence of historic patronage can be described here (e.g. estate workers' housing or a philanthropic model settlement).

Open space, parks and gardens, and trees

- 56 This part of the appraisal describes open spaces within or immediately outside the conservation area, their enclosure, and their visual, and/or other sensory contribution to the character of the place. The relationship between public space (such as a market place, street, square, public garden or car park) and private space (gardens, courtyards or playing fields), the qualities they offer and the ways in which the spaces were and are used, and the identification of key settlement edges, are all part of this analysis.
- 57 Some open spaces, parks and gardens may be included on the Historic England *Register of Parks and Gardens of special historic interest*. Domestic gardens, especially planted front gardens, can make a significant contribution to the character of many conservation areas. Trees, hedges, boundaries and street greenery are important elements of many conservation areas, not only in public places, but on private land as well. Identification of important single trees and groups and a description of their location and species, age and assessment of condition and potential lifespan will assist in developing a strategy for protection, maintenance and replanting.

Character zones

- 58 Discernible character areas or zones are often evident in larger conservation areas and may already have been defined using a historic characterisation approach such as Historic Area Assessment. They may reflect the predominant historic character that survives from earlier periods or the original function, class distinctions, design or current uses (e.g. residential, industrial, commercial, civic or transport-related). The sub-areas may overlap or have 'blurred edges', for example where a 19th century

development is partly on historic urban plots and partly in former fields, creating ‘zones of transition’ between areas of consistent character.

- 59 Character areas identified and illustrated on a plan will provide not only a detailed description of the physical constituents but also an evaluation of the significance of the sub-area concerned and a summary of its special interest, in the context of the area as a whole, or of the wider settlement, if the conservation area covers only a part of it.
- 60 If there are no recognisable zones the appraisal might highlight the influence that change over time has had in the development of the area, as a whole, particularly if there is diversity and contrast in architectural styles (note might also be made, if relevant, of the impact of different national and international planning and architectural movements on the area).

Positive contributors

- 61 Most of the buildings in a conservation area will help to shape its character. The extent to which their contribution is considered as positive depends not just on their street elevations but also on their integrity as historic structures and the impact they have in three dimensions, perhaps in an interesting roofscape or skyline. Back elevations can be important, as can side views from alleys and yards. It will be helpful to identify those key unlisted buildings that make an important contribution to the character of the conservation area, as well as those which clearly detract from it and could be replaced. A checklist of questions to help with this process can be found in Table 1. A positive response to one or more of the following may indicate that a particular element within a conservation area makes a positive contribution, provided that its historic form and value have not been eroded.

<input type="checkbox"/>	Is it the work of a particular architect or designer of regional or local note?
<input type="checkbox"/>	Does it have landmark quality?
<input type="checkbox"/>	Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?
<input type="checkbox"/>	Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?
<input type="checkbox"/>	Does it contribute positively to the setting of adjacent designated heritage assets?
<input type="checkbox"/>	Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?
<input type="checkbox"/>	Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?
<input type="checkbox"/>	Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?
<input type="checkbox"/>	Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park or a landscape feature?
<input type="checkbox"/>	Does it have historic associations with local people or past events?
<input type="checkbox"/>	Does it reflect the traditional functional character or former uses in the area?
<input type="checkbox"/>	Does its use contribute to the character or appearance of the area?

Table 1
Checklist

Locally important buildings

62 Recommendations for new local listings could form part of the appraisal or, if there is no 'local list', the appraisal might recommend the introduction of local criteria for identifying important unlisted buildings (<http://historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>). Local constructional or joinery details, including characteristic historic shop-fronts and unusual local features, often contribute to local distinctiveness.

An audit of heritage assets

63 An audit of heritage assets will be helpful in larger, more complex areas, where there is a wide range of historic structures, and/or in areas with an industrial heritage, importantly including a description of condition. Tabulate the results and include them as an appendix to the appraisal, and/or on a map. Where significant change to public space is proposed, an audit of the public realm may be appropriate, noting in the appraisal if such an audit needs to be undertaken.

Assessment of condition

64 The appraisal also offers the opportunity to record the general condition of the area, that is both its economic vitality and the physical condition of the historic buildings, other heritage assets and the public realm, identifying:

- buildings at risk or in a serious state of disrepair
- buildings where in rare cases matters of deliberate neglect may arise
- front gardens lost to hard-standing for cars
- lost architectural features and fenestration
- gap sites eroding special character

In some cases, it may be appropriate to map and photograph surviving original architectural features and fenestration – distinctive local detailing, doors, windows, roof coverings, trees - to aid future monitoring and enforcement (*Understanding Place: Historic Area Assessment: Principles and Practice*, paragraph 2.4.2 sets out some useful questions to help with this part of the appraisal).

65 Generic issues that underlie obvious problems such as:

- the effects of heavy traffic
- a low economic base resulting in vacancy and disrepair of buildings
- pressure for a particular type of change or development
- as well as specific examples (such as buildings at risk, or uncontrolled, inappropriate advertising)

will provide evidence and identify the need for additional controls, particularly Article 4 directions, to prevent further erosion of the area's special interest and support its potential capacity for beneficial change.

Identifying the boundary

66 An important aspect of the appraisal (and review) process will be considering where the boundaries should be drawn (and whether the boundaries of an existing conservation area should be re-drawn). An explanation of why the boundary is drawn where it is (or extensions are suggested, in the case of existing conservation areas), and what is included and what is excluded, is helpful. The position of the conservation area boundary will to a large degree be informed by the considerations identified in paragraphs 17-18 (Finalising and reviewing the boundary). As spaces contribute to enclosure, as well as framing views of assets and defining settings, a unified approach is

desirable to their management as well as suggesting that in almost all situations the conservation area boundary runs around rather than through a space or plot. It will generally be defined by physical features and avoid for example running along the middle of a street, though including the boundary wall of a property which is otherwise not included can in itself cause problems when applying conservation area policies in development management decisions.

A plan for further action and generic guidance

67 This section of the appraisal presents an overview and summarises the main problems and pressures identified in the appraisal that will be addressed through a management plan.

References, appendices and contact details

68 This section lists references to the principal sources of historic and local information, a short glossary of relevant architectural and vernacular terms, an audit of heritage assets, the criteria used for assessing the contribution made by unlisted buildings in the conservation area, useful names and addresses (of both national and local organisations) and the local authority's contact details for enquiries and comments.

Appendix 1:

Article 4 Directions

1 Minor development such as domestic alterations and extensions can normally be carried out without planning permission under the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO). Article 4 of the GPDO gives local planning authorities the power to limit these ‘permitted development rights’ where they consider it is necessary to protect local amenity or the wellbeing of the area. Using the provisions of Article 4 of the GPDO brings certain types of development back under the control of a local planning authority so that potentially harmful proposals can be considered on a case by case basis through planning applications.

Assessing the Need

2 The specific requirement on local authorities under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to carry out a conservation area appraisal provides a robust evidence base on which to assess the need for and scope of an Article 4 direction. Ideally a conservation area management plan

developed from a conservation area appraisal may identify areas where removal of ‘permitted development rights’ is necessary to prevent the loss of characteristic architectural detailing or gradual erosion of the character and appearance of the conservation area through inappropriate development. Historic characterisation approaches such as Historic Area Assessment will also provide evidence for using Article 4 directions outside conservation areas.

Scope

3 It is only appropriate to remove permitted development rights where there is a real and specific threat and exclude properties where there is no need for the direction to apply. Article 4 directions are most commonly used to control changes to elevations of buildings in conservation areas fronting a highway, waterway or open space but they can also be used to control other forms of development which might harm the significance of heritage assets.

Monitoring and Enforcement:

- 4 Article 4 directions are more likely to be effective if:
 - there is a dated photographic record of the properties affected for the purposes of tracking any subsequent changes
 - guidance is provided for homeowners on how the direction affects them with advice on appropriate repair and alteration
 - the local authority undertakes regular monitoring for compliance and appropriate enforcement
 - the need for the Article 4 direction is reviewed if circumstances change.

Impact on Resources

- 5 Increase in planning applications is likely to be minimal as clear, concise controls, backed up by appropriate guidance, tend to encourage like-for-like repair or replacement in matching materials, which do not require planning permission (*RPS Planning Research into the use of Article 4 directions on behalf of the English Historic Towns Forum* October 2008, paragraphs 3.18-3.19).
- 6 Compensation claims have been extremely rare. The RPS 2008 study found no evidence for any compensation payments actually being made (*op. cit.*, paragraphs 3.20-3.21).
- 7 In terms of the cost of preparation, integrating proposals for Article 4 directions with local plan preparation and conservation area appraisals minimises costs.
- 8 Government guidance on making Article 4 directions can be found in the Planning Practice Guidance, paragraphs 036 (reference ID: 13-036-20140306) to 053 (Reference ID: 13-053-20140306).

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Making Changes to Heritage Assets

Historic England Advice Note 2



Summary

This advice note illustrates the application of the policies set out in the NPPF in determining applications for planning permission and listed building consent, as well as other non-planning heritage consents, including scheduled monument consent. It provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone, based on the following types of heritage asset: buildings and other structures; standing remains including earthworks; buried remains and marine sites; and larger heritage assets including conservation areas, landscapes, including parks and gardens, and World Heritage Sites. It will be useful to owners, developers, local planning authorities and others in considering works to heritage assets.

Making Changes to Heritage Assets was first published as part of the Planning Policy Statement 5 Practice Guide in 2010. This edition has been revised following consultation in 2015.

It is one of a series of Historic England Advice Notes
<https://www.historicengland.org.uk/advice/planning/planning-system/>

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[HistoricEngland.org.uk/advice/planning](https://www.historicengland.org.uk/advice/planning)

Front cover:

The reconstructed south oriel of St Edward's Presbytery at A W N Pugin's Grange in Ramsgate, Kent, originally built by his architect son, Edward Welby Pugin. It has been partially reconstructed following research, removing unsympathetic alterations made in the 1960s.

© The Landmark Trust

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Introduction

- 1 The purpose of this Historic England Advice note is to provide information on repair, restoration, addition and alteration works to heritage assets to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment legislation, the policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.
- 2 This advice promotes positive, well-informed and collaborative conservation, the aim of which is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure that people can continue to use and enjoy them. Change to heritage assets and their settings is, of course, acceptable where it is sustainable in terms of the NPPF; change is only unacceptable where it harms significance without an appropriate balance of public benefit.
- 3 The best way to conserve a building is to keep it in use, or to find it an appropriate new use if it has passed out of use, either that for which it was designed or an appropriate new use which would see to its long-term conservation. Even recently restored buildings that are vacant will soon start to degenerate. An unreasonable, inflexible approach will prevent action that could give a building new life; indeed it can eliminate that use. A reasonable and proportionate approach to owners' needs is therefore essential.
- 4 This advice note therefore illustrates the application of the policies set out in the NPPF in determining applications for planning permission and listed building consent, as well as other non-planning heritage consents, including scheduled monument consent. The examples given are not a substitute for the process of understanding the particular significance of the affected assets and the impact upon that significance in each case. Each heritage asset and group of heritage assets has its own characteristics that are usually related to an original or subsequent function. These can include orientation, layout, plan-form, setting, materials and construction, the disposition of openings, external detailing (with larger assets or groups of assets this might include street furniture and paving) and internal fittings.

- 5 The limits imposed by the structure and features of the asset are an important consideration, as is an understanding of the significance of individual elements, derived both from the physical evidence and documentary sources.
- 6 There are various legal requirements that buildings have to comply with, such as Building Regulations and the Equality Act 2010. Sometimes the best means of conserving a heritage asset will seem to conflict with the requirements of such regimes. It is good practice for local planning authorities to consider imaginative ways of avoiding such conflict. Where conflict is unavoidable, such regimes generally allow for some flexibility so that a balance can be struck.
- 7 Where change is proposed to a heritage asset, it can usually be characterised as:
- Repair
 - Restoration
 - Addition and alteration, either singly or in combination; and
 - Works for research alone
- 8 Ways of dealing with these types of intervention are considered for each of the following categories of heritage asset:
- Buildings and other structures
 - Standing remains including earthworks
 - Buried remains and marine sites, including evidence of past environmental change, landscapes now submerged in rivers, estuaries and coastal areas to the low-water mark
 - Large heritage assets including conservation areas, formal or informal landscapes at all scales, clusters of scheduled monuments, and World Heritage Sites, where the whole is greater than the sum of the parts
- Some heritage assets may fall into more than one category.

1 Repair

General Points

- 9 With the exception of repairs to scheduled monuments, which will almost always need consent, minor repairs are unlikely to require planning permission or listed building consent (where relevant) if the works are carried out using the same materials and techniques and they do not affect the significance of the asset. Where certainty is needed by applicants, a Certificate of Lawful Proposed Works will assist. It is good practice for owners/applicants to seek their own advice; the local planning authority can advise.
- 10 Good conservation of heritage assets is founded on appropriate routine management and maintenance. Such an approach will minimise the need for larger repairs or other interventions and will usually represent the most economical way of sustaining an asset.

Buildings and Other Structures

- 11 Original materials normally only need to be replaced when they have failed in their structural purpose. Repairing by re-using materials to match the original in substance, texture, quality and colour, helps maintain authenticity, ensures the repair is technically and visually compatible, minimises the use of new resources and reduces waste. However, alternative approaches may be appropriate if it can be demonstrated that the technique will not cause long-term damage to the asset and results in less overall loss of original fabric

and significance or demonstrates other major benefits. An example may be the use of resin or steel reinforcements to stabilise structural timbers without loss of historic fabric. Repairs to a listed building may require consent. One would expect that the loss of historic fabric following repairs and alteration would be proportionate to the nature of the works.

- 12 Replacement of one material by another may harm significance and will in those cases need clear justification. Therefore, while the replacement of an inappropriate and non-original material on a roof, for example, is likely to be easily justified, more justification will be needed for changes from one type of thatch, slate or tile to another, or for changes in the way the material is processed, applied and detailed.
- 13 Even when undertaking repair, care is needed to maintain the integrity of the asset. Some repair techniques, such as the use of cement-based mortars in place of softer lime, will affect the integrity of the existing building and cause permanent damage to the historic fabric, as well as being visually unsympathetic. Re-pointing of historic mortar will normally leave the significance of the asset unaffected, provided the original mix and appearance is copied but care is often needed not to affect subtle changes in pointing. A change in the character of the pointing, or painting exposed surfaces including concrete, can be visually and physically damaging and is likely to require listed building consent, as may a change in external paint colour.

14 The removal of hard renders may cause more damage to the significance of the building than retention. In modern buildings cement render may be the original finish and in such cases it is appropriate for it to be retained and matched when repaired. Features such as tool marks, carpenters' marks, smoke blackening, decorative painting, pargetting or sgraffito work are always damaged by sand-blasting and sometimes by painting or other cleaning, as is exposed timber. Such treatments are unlikely to be considered as repairs and would normally require listed building consent.

15 Doors and windows are frequently key to the significance of a building. Replacement is therefore generally advisable only where the original is beyond repair, it minimises the loss of historic fabric and matches the original in detail and material. Secondary glazing is usually more appropriate and more likely to be feasible than double-glazing where the window itself is of significance. As with the building as a whole, it is more appropriate to deal with timber decay and similar threats by addressing the cause of the decay rather than treating the symptoms but where remedial works are shown to be necessary, minimum interference to achieve reasonable long term stability is the most sustainable approach. The replacement of unsuitable modern windows with more historically appropriate windows is likely to be an enhancement.

16 Repairs can sometimes have an impact on the archaeological interest of a heritage asset and may reveal new information relating to the significance of that asset. The recording of evidence revealed by such works may therefore be appropriate. Proportionate approaches to archaeological investigation are emphasised in Historic England Good Practice Advice note 2: Managing Significance in Decision-Taking in the Historic Environment, paragraph 17 - <http://www.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>.

Standing Remains

17 Beyond routine maintenance, required repairs are unlikely to be more than the addition of visually unobtrusive elements to give longer term protection, such as rough-racking or the soft capping of walls with turf, or a shelter coat of limewash or lead flashings, that can mitigate the effects of weathering and be replaced relatively regularly without affecting the earlier elements.

Buried Remains, including Marine Sites

18 Repairs may be required as part of a general management regime, but care will be needed to ensure that they do not cause damage to the significance of the asset (particularly its archaeological interest).

Large Heritage Assets

- 19 The general principles apply. There are various approaches to managing complex heritage assets; more information is given on the Historic England website. Proactive forward management is essential to the effective conservation of large buildings and carefully planned and phased repair programmes may assist in the long-term management of such assets by spreading costs and reducing the chances of unexpected works becoming urgently necessary.
- 20 In respect of parks and gardens, repair will generally be part of ongoing management of the land. Maintenance conserves the original fabric in good order and safeguards design intentions; breaks in maintenance may lead to failure of elements and necessitate repairs or sometimes restoration. Accurate repair following decay is likely to be justified as a means of perpetuating the design if there is sufficient record of that design to inform the repair and if the elements (trees, plants or other parts of the fabric) and the techniques used are close and high quality matches to the original. For battlefields, which are generally managed agricultural land, repair is likely to take the form of small-scale interventions, eg maintaining walls, hedges or fences.

2 Restoration

General Points

- 21** Restoration of a listed building requires its alteration and is therefore likely to need listed building consent and may also require planning permission. It is good practice for owners/applicants to seek their own advice; many local planning authorities will also be able to assist, very usefully at the pre-application stage.
- 22** The words repair and restoration are sometimes used interchangeably, particularly in popular usage and in terms of parks and gardens where restoration is often used with reference to what would be called repair for buildings.
- 23** Restoration may range from small-scale work to reinstate missing elements of decoration, such as the reinstatement of sections of ornamental plasterwork to a known design, to large schemes to restore the former appearance of buildings with the addition of major missing elements such as a missing wing. Previous repairs and/or alterations may be historically and architecturally valuable, and may provide useful information about the structure of the building, as will the recording of any features revealed by the work. New work can be distinguished by discreet dating or other subtle means. Overt methods of distinction, such as tooling of stonework, setting back a new face from the old or other similar techniques, are unlikely to be sympathetic.
- 24** Restoration is likely to be acceptable if:
- The significance of the elements that would be restored decisively outweighs the significance of those that would be lost
 - The work proposed is justified by compelling evidence of the evolution of the heritage asset and is executed in accordance with that evidence
 - The form in which the heritage asset currently exists is not the result of a historically-significant event
 - The work proposed respects previous forms of the heritage asset
 - No archaeological interest is lost if the restoration work could later be confused with the original fabric
 - The maintenance implications of the proposed restoration are considered to be sustainable
- 25** Restoration works are those that are intended to reveal or recover something of significance that has been eroded, obscured or previously removed. In some cases, restoration can thus be said to enhance significance. However, additions and changes in response to the changing needs of owners and occupants over time may themselves be a key part of the asset's significance.

26 In determining whether restoration is appropriate following catastrophic damage (e.g. from fire or flood) the practicability of restoration should be established by an assessment of remaining significance. Where the significance relates to a design concept or a particular event rather than held directly in the original fabric of the asset, restoration or replication is more likely to be acceptable.

Buildings

27 Restoration involving the stripping-off of later layers of work or abrasive cleaning is only likely to be acceptable where it can be shown that:

- The later layers are not of significance in themselves
- They are damaging the original and other significant fabric, and
- By their removal there would be an enhancement to the significance of the building that outweighs the loss of the later addition

28 Stripping off finishes such as plaster to expose rubble, brick or timber-framed walls never intended to be seen is likely to have an adverse effect on the building's significance, aside from likely harm to the building's weathering ability, through the loss of historic materials and original finishes and harm to its aesthetic. Where it is proposed to remove more modern coverings that are harmful to the significance or the integrity of the building, appropriate materials will need to be introduced to ensure an authentic and/or suitably detailed finish is achieved, for example using mock jointing, or lining out, where there is evidence of this being the original finish. If there is any doubt as to the authentic finish, it is usually good practice to create a simple finish rather than one with speculative decoration. Sometimes

early framing or finishes were covered up because they were in a poor state and unacceptable loss of original fabric may result from works to make the earlier surface visually acceptable.

29 Many building types have much published information on appropriate restoration techniques. Timber-framed buildings, for example, have been well-researched and appropriate conservation approaches have been shown to work very well while minimising loss of original fabric and structural integrity. Secondary elements, such as the infilling of timber frames, are of value and their retention will maintain the integrity of the whole building. The reuse of original materials whenever possible will meet conservation and other sustainability objectives.

30 The legibility of names on war memorials is important and their re-cutting and/or re-painting in an appropriate manner are likely to be acceptable. For other inscriptions, conservation rather than restoration may be preferred, where the original script is significant.

31 If convincing evidence is available it may be appropriate to take opportunities to reinstate missing architectural details, such as balustrades and cornices or missing elements of a decorative scheme, using traditional methods and materials.

Standing Remains

- 32 Restoration, as opposed to repair, may be appropriate where there is compelling evidence of the former state of the structure and demonstrable benefits to the significance of the standing remains would result. By weighing the merits against any harm caused, including to the archaeological interest, the acceptability of such an approach can be established.
- 33 The local planning authority will need to carefully balance the long-term benefits of bringing a ruined structure back into use with the loss of significance from the impact to the fabric that might result from restoration.
- 34 Restoration of elements to benefit the ongoing management and conservation of earthworks, such as infilling gaps in earth mounds, vegetation clearance or dealing with the effects of burrowing animals may be justified.

Buried Remains including Marine Sites

- 35 Restoration of buried remains is unlikely to be acceptable. If the remains still form a structure (perhaps in the form of foundations), work to remove the soil overburden and expose the remains may be justified but will need to be balanced against the likely threat to the sustainability and archaeological interest of the asset. Leaving the site undisturbed is usually the preferred solution. Where the goal is to illustrate the past or educate, interpretation panels that illustrate the site's significance could provide a more appropriate solution.
- 36 For marine sites, repair and restoration for wreck structures are unlikely to form a significant part of their management but stabilisation and erosion protection strategies may be appropriate to sustain their integrity, taking into account the historic environment policies in the UK Marine Policy Statement under the Marine and Coastal Access Act 2009. Heritage Partnership Agreements may also be of assistance to ensure that the long-term future of the site is understood and, so far as is practicable, managed in the best interests of its conservation.

Large Assets

- 37 An inconsistency of approach to repair and restoration because of its different ownerships, spatially or over time, or in methods and techniques may result in a loss of significance by obscuring the historic or aesthetic connection between elements within the asset and affect the evidential value of the asset as a whole. It may be possible to achieve consistency through a Listed Building Heritage Partnership Agreement or Local Listed Building Consent Order, or through a conservation management plan.
- 38 The spaces between the buildings within an area asset may be important and may be consciously designed (such as a town square); have developed over a period of time (such as parkland surrounding a country house); or be the space between similar assets with some other link, such as a variety of earthworks on downland. Restoration of individual elements within a group of assets is more likely to enhance the group if the effect on the other assets has been considered from the outset. Restoration of a designed space is more likely to meet the NPPF criteria, especially where there is public benefit, for example in the re-creation of the historic street pattern, including widths of streets and plots and heights of buildings and storeys, following the removal of a later development that was unsympathetic to the urban grain. The case for restoration will be stronger where it can be shown that the restoration improves the appreciation of the space and the settings of the assets that are linked to it.
- 39 Restoration may be appropriate in historic parks and gardens where the original design has been obscured despite regular maintenance and where it is possible to establish the original design through research and investigative work, and the work does not diminish the significance of the asset.
- 40 The significance of historic battlefields will usually result from evidential and associative value that depends on the ability to appreciate the location, topography and setting of the site. Restoration may involve removing later additions and features or reinstating known earlier features. The sensitivity of any archaeological interest in the site will be important when considering whether any restoration is appropriate.

3 Addition and Alteration

General Points

- 41** The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting. Replicating a particular style may be less important, though there are circumstances when it may be appropriate. It would not normally be good practice for new work to dominate the original asset or its setting in either scale, material or as a result of its siting. Assessment of an asset's significance and its relationship to its setting will usually suggest the forms of extension that might be appropriate.
- 42** The historic fabric will always be an important part of the asset's significance, though in circumstances where it has clearly failed it will need to be repaired or replaced; for instance, seaside piers, constructed in timber and iron in a very hostile environment, will only survive through replication of corroded elements and mass-produced components in some C20 buildings, such as steel-framed windows, may not be simple to repair and repair would therefore be disproportionate. In normal circumstances, however, retention of as much historic fabric as possible, together with the use of appropriate materials and methods of repair, is likely to fulfil the NPPF policy to conserve heritage assets in a manner appropriate to their significance, as a fundamental part of any good alteration or conversion. It is not appropriate to sacrifice old work simply to accommodate the new.
- 43** The junction between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting. Where possible it is preferable for new work to be reversible, so that changes can be undone without harm to historic fabric. However, reversibility alone does not justify alteration; If alteration is justified on other grounds then reversible alteration is preferable to non-reversible. New openings need to be considered in the context of the architectural and historic significance of that part of the asset and of the asset as a whole. Where new work or additions make elements with significance redundant, such as doors or decorative features, there is likely to be less impact on the asset's aesthetic, historic or evidential value if they are left in place.

Buildings and Structures

- 44 When a building is adapted for new uses, its form as well as its external and internal features may impose constraints. Some degree of compromise in use may assist in retaining significance. For example, headroom may be restricted and daylight levels may be lower than usually expected.
- 45 The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.
- 46 The sub-division of buildings, such as threshing barns and churches, that are significant for their open interiors, impressive proportions and long sight lines, may have a considerable impact on significance. In these circumstances the use of pods or other design devices that allow the entirety of the space to be read may be appropriate.
- 47 The introduction of new floors into a building or removal of historic floors and ceilings may have a considerable impact on an asset's significance. Certain asset types, such as large industrial buildings, are generally more capable of accepting such changes without unacceptable loss of significance.
- 48 The insertion of new elements such as doors and windows, (including dormers and roof lights to bring roof spaces into more intensive use) is quite likely to adversely affect the building's significance. Harm might be avoided if roof lights are located on less prominent roof slopes. New elements may be more acceptable if account is taken of the character of the building, the roofline and significant fabric. Roof lights may be more appropriate in agricultural and industrial buildings than dormers. In some circumstances the unbroken line of a roof may be an important contributor to its significance.
- 49 New features added to a building are less likely to have an impact on the significance if they follow the character of the building. Thus in a barn conversion new doors and windows are more likely to be acceptable if they are agricultural rather than domestic in character, with the relationship of new glazing to the wall plane reflecting that of the existing and, where large door openings are to be glazed, with the former doors retained or replicated so that they can be closed.
- 50 Small-scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs, will frequently contribute strongly to a building's significance and removing or obscuring them is likely to affect the asset's significance.
- 51 Historic flooring materials will often be of interest in themselves. Additional care is needed on lower floors to ensure that archaeological interest below the finished surface is not adversely affected by proposed works.

- 52 Although some works of up-grading, such as new kitchens and bathroom units, are unlikely to need consent, new services, both internal and external, can have a considerable, and often cumulative, impact on the significance of a building and can affect significance if added thoughtlessly. The impact of necessary services can be minimised by avoiding damage to decorative features, by carefully routing and finishing and by use of materials appropriate to the relevant period, such as cast iron for gutters and down-pipes for many Georgian and Victorian buildings. Certificates of Lawful Proposed Works, Local Listed Building Consent Orders and Listed Building Heritage Partnership Agreements may all be useful mechanisms to clarify where the limits of permissibility exist in individual cases.
- 53 Removal of, and change to, historic shopfronts may damage the significance of both the building and the wider conservation area, as may the introduction of new shopfronts to historic buildings where there are none at present. All elements of new shopfronts (stall-risers, glazing, doors, fascias, etc.) may affect the significance of the building it is located in and the wider street setting. External steel roller shutters are unlikely to be suitable for historic shopfronts. Laminated glass and internal chain-link screens are likely to be more appropriate alternatives in most instances.
- 54 Where the proposal involves a change of use, particularly to single or multiple residential units, local planning authorities may consider that the impact on the building and its setting of potential future permitted development, such as conservatories, garden sheds and other structures associated with residential use, make the change of use proposal unacceptable in principle. Conditions preventing or limiting such future permitted development may make the change of use proposal acceptable.
- 55 Buildings will often have an important established and historic relationship with the landscaping that exists or used to exist around them. Proposals to alter or renew the landscaping are more likely to be acceptable if the design is based on a sound and well-researched understanding of the building's relationship with its setting, both now and in the past.

Standing Remains and Buried Remains including Marine Sites

56 New work and alterations are likely to be rare. There may be cases where a new structure enables the long-term care of the original asset or its interpretation and conservation, or where alterations may assist the long-term conservation of the asset. Works other than those of a minor nature are likely to be acceptable only where they would be in the best long-term interests of the conservation of the remains or there are other important planning justifications. Any additions or alterations to marine sites or sites affecting the marine area must be made in accordance with the UK Marine Policy Statement and relevant Marine Plan.

Large Assets

57 The same principles will apply, where appropriate, as those set out for buildings, standing remains, buried remains, marine sites and landscapes. The retention and restoration of surfacing and street furniture sometimes makes a very positive contribution to the character and appearance of a conservation area. Quality of place can be enhanced where opportunities are taken for the re-introduction of missing elements in adjacent areas, if there is historical evidence for them. The local tradition in scale, materials, texture, colour and laying patterns will inform appropriate new paving, with the traditional relationship between footways and carriageways retained. Traffic management measures can be integrated into the historic environment effectively by retaining features such as walls, trees, hedges and railings and horizontal and vertical alignments and surfaces such as cobbles and stone setts which naturally calm speeds. Where new features are introduced the observance of existing design principles and use of local traditional materials will ensure they do not appear intrusive.

58 The varying degrees of sensitivity to change within landscapes can normally be identified and incorporated into alterations and additions in ways that will enhance the asset's significance. However, a small minority of landscapes will be so sensitive that the degree of alteration or addition possible without loss of significance may be very limited, particularly where there is a consistently high level of archaeological interest or architectural consistency.

Works for Research Alone

- 59 A research investigation involving intrusive works to an asset requiring permission or consent is sometimes proposed as a stand-alone project and not merely as an exercise in investigating an asset that will be lost or altered for other reasons. It may be justified if there will be a public benefit gained if the investigation results in an increased understanding of our past and this will be maximised if it is well planned, executed and the results properly publicised and disseminated. Information on how to secure the best results from an investigation is set out in Good Practice Advice note 2 (Managing Significance in Decision-Taking in the Historic Environment). For further information see also Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities, (2008) - <https://content.historicengland.org.uk/images-books/publications/understanding-historic-buildings-policy-and-guidance/understanding-historic.pdf/>.
- 60 Any intrusive investigation may reduce the significance of an asset and impair the available resource for future archaeological investigation. It may also affect the historic and aesthetic values of the asset. Factors worthy of consideration when looking at the balance of the public benefit from the investigation and that loss of significance include:
- whether at least part of the investigation can be achieved using non-destructive techniques
 - whether the understanding sought could be found elsewhere, perhaps from another site where destruction is inevitable
 - the likelihood of the investigation yielding critical evidence to our understanding of the past
 - whether the increase in public knowledge decisively outweighs any damage to the asset in question
 - a skilled team with the resources to implement a project design based on explicit research objectives; and
 - the predicted rate of environmental decay of the asset
- 61 Metal-detecting on a scheduled monument for any reason requires a licence and intrusive investigation for research purposes will require scheduled monument consent. Further guidance is published by DCMS and advice can be sought from Historic England.

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Historic England

The Historic Environment and Site Allocations in Local Plans

Historic England Advice Note 3



Summary

The identification of potential sites for development within a Local Plan is an important step in establishing where change and growth will happen across local authority areas, as well as the type of development and when it should occur. This document is intended to offer advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.

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Front cover: Exeter from the air

The city centre with cathedral towards bottom left,
looking south towards the Exe estuary and Exmouth

Introduction

The purpose of this Historic England advice note is to support all those involved in the Local Plan site allocation process in implementing historic environment legislation, the relevant policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives. The advice in this document may also be of use in the preparation of Neighbourhood Plans where sites are being allocated.

The inclusion of sites within a Local Plan establishes locations for types of development within the authority's administrative area. A positive strategy for the historic environment in Local Plans can ensure that site allocations avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting. At the same time, the allocation of sites for development may present opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets (NPPF paragraph 137) or may provide an opportunity to tackle heritage at risk through the sensitive development of specific sites. This document offers advice for each of the key stages in the site allocation process consisting of 1) evidence gathering 2) site selection and 3) site allocation policies. All of these stages relate to the normal course of plan preparation, and do not entail any additional tasks, maximising the effectiveness of the work being undertaken, and the likelihood of the Local Plan being found sound.

In allocating sites, in order to be found sound, it is important to note that as set out in paragraph 182 of the NPPF the proposals are to be positively prepared; justified; effective and consistent with national policy. It is also important to note various legislative and policy requirements:-

- The Local Plan should set out a positive strategy for the conservation and enjoyment of the historic environment, in which the desirability of sustaining and enhancing the significance of heritage assets should be considered (NPPF paragraph 126); the associated statutory duty regarding the desirability of preserving or enhancing the character or appearance of a conservation area must be considered in this regard (S72, Planning (Listed Buildings and Conservation Areas) Act 1990);
- Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal, taking into account an assessment of its significance (NPPF paragraph 129);
- Great weight should be given to an asset's conservation and the more important the asset, the greater the weight to the asset's conservation there should be (NPPF paragraph 132);
- Local plans must be prepared with the objective of contributing to the achievement of sustainable development (NPPF, paragraph 151). As such, significant adverse impacts on the three dimensions of sustainable development (including heritage and therefore environmental impacts) should be avoided in the first instance. Only where adverse impacts are unavoidable should mitigation or compensation measures be considered (NPPF paragraph 152). Any proposals that would result in harm to heritage assets need to be fully justified and evidenced to ensure they are appropriate, including mitigation or compensation measures.

Site Allocation Process

Stage 1: Evidence Gathering

1.1 The site allocation process is best informed by an up-to-date and robust historic environment evidence base. It is important that the gathering of this evidence begins prior to the commencement of work on the Plan, to provide baseline information at all stages in its preparation. The relevant Historic Environment Record (HER) and other evidence held by the local planning authority will help establish the baseline information. This in turn will help identify heritage assets affected (e.g. desktop analysis), whilst also identifying gaps in the evidence base where there may be a need to produce further information which will be needed in order to fully understand the potential impacts of potential site allocations on the historic environment. Discussions with community groups/organisations may, in some cases, also offer further evidence. The evidence gathered should relate to both designated and non-designated heritage assets, in accordance with the NPPF. It should be used at all stages of plan making if soundness is to be demonstrated, and inform the [Sustainability Appraisal and Strategic Environmental Assessment](#).

1.2 Some of the evidence which may be relevant is listed in [GPA 1](#). The amount and level of further evidence, and who should be responsible for producing it, will vary depending

on site specific circumstances, but the advice of appropriate specialists such as local authority conservation and/or archaeological officers is invaluable during the process of gathering evidence, commissioning further work, and undertaking interpretation. The application of evidence could include:

- Characterisation work to understand the potential impact of site allocations on historic places, and inform assessments of an area's capacity to accommodate development.
- The updating of existing information, such as the production of a more detailed study on [the significance of heritage assets](#), including assessment of their setting, an assessment to understand heritage impacts in greater detail or the identification of new heritage assets.
- Site specific studies, such as archaeological desk based assessment and fieldwork, may also be necessary to provide adequate information.

Stage 2: Site Selection

2.1 The site selection process needs to be detailed enough to:

- Support the inclusion of appropriate sites for development or regeneration (including those which could enhance the historic environment), or;
- Justify the omission of a site where there is identified harm, and;
- Set out clear criteria for sites that are acceptable in principle, within which they can be appropriately developed in terms of impact on heritage assets, for example, its size, design, or density.

2.2 It is important to understand the significance of any heritage assets that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge of impact is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area or World Heritage Site) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms. The steps in the table on page 5 set out the methodology which can assist regarding site selection.

Stage 3: Site Allocation Policies

3.1 Site allocation policies are a positive feature of a Local Plan as they can highlight the specific criteria against which a development needs to be judged and thereby speed up the implementation process, providing clarity for a wide range of audiences. It is recommended that the policy and/or supporting text provides clear references to the historic environment and specific heritage assets where appropriate.

3.2 The level of detail required in a site allocation policy will depend on aspects such as the nature of the development proposed and the size and complexity of the site (NPPF, paragraph 154 and 157). However, it ought to be detailed enough to provide information on what is expected, where it will happen on the site and when development will come forward including phasing. Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.

3.3 Design principles (and design codes) are a helpful way of making development more sustainable and acceptable. These can be set out in a site specific policy or appropriate equivalent and will guide future masterplans and planning applications.

Site Selection Methodology

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

- Informed by the evidence base, local heritage expertise and, where needed, site surveys
- Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases Heritage assets that lie outside of these areas may also need identifying and careful consideration.

STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:

- Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)
- Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)
- Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information
- For a number of assets, it may be that a site makes very little or no contribution to significance.

STEP 3 Identify what impact the allocation might have on that significance, considering:

- Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views
- Form and appearance of development e.g. prominence, scale and massing, materials, movement
- Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use
- Secondary effects e.g. increased traffic movement through historic town centres as a result of new development

STEP 4 Consider maximising enhancements and avoiding harm through:

Maximising Enhancement

- Public access and interpretation
- Increasing understanding through research and recording
- Repair/regeneration of heritage assets
- Removal from Heritage at Risk Register
- Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design

Avoiding Harm

- Identifying reasonable alternative sites
- Amendments to site boundary, quantum of development and types of development
- Relocating development within the site
- Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings
- Addressing infrastructure issues such as traffic management

STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness

- Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)
- Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence
- Effective in terms of deliverability, so that enhancement is maximised and harm minimised
- Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance

Decisions should be clearly stated and evidenced within the Local Plan, particularly where site allocations are put forward where some degree of harm cannot be avoided, and be consistent with legislative requirements.

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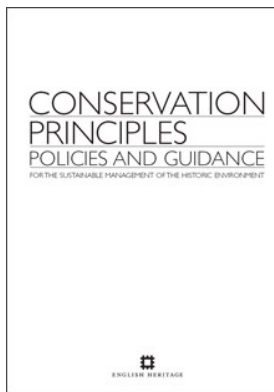
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Historic England

Conservation Principles, Policies and Guidance



On 1st April 2015 the Historic Buildings and Monuments Commission for England changed its common name from English Heritage to Historic England. We are now re-branding all our documents.

Although this document refers to English Heritage, it is still the Commission's current advice and guidance and will in due course be re-branded as Historic England.

[Please see our website](#) for up to date contact information, and further advice.

We welcome feedback to help improve this document, which will be periodically revised. Please email comments to guidance@HistoricEngland.org.uk

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Historic England

The Historic Environment in Local Plans

Historic Environment Good Practice Advice in Planning: 1



This document was produced by Historic England in collaboration with the Historic Environment Forum, and with the particular assistance of:

Association of Local Government Archaeological Officers

British Property Federation

Council for British Archaeology

Chartered Institute for Archaeologists

Country Land and Business Association

Civic Voice

Heritage Alliance

Historic Houses Association

Historic Towns Forum

Institute of Historic Buildings Conservation

National Trust

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Introduction

1 The purpose of this Historic England Good Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the **National Planning Policy Framework (NPPF)** and the related guidance given in the **National Planning Practice Guide (PPG)**. This good practice advice acknowledges the primacy of relevant legislation and the NPPF and PPG. While it supports the implementation of national policy it does not constitute a statement of Government policy itself, nor does it seek to prescribe a single methodology or particular data sources. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.

2 The advice in this document, in accordance with the NPPF, emphasises that all information requirements and assessment work in support of plan-making and heritage protection needs to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time, those taking decisions need sufficient information to understand the issues and formulate balanced policies (NPPF Paragraphs 157-8, 169-70 and 192).

NPPF requirements

3 The **NPPF** sets out in various different places a number of requirements for Local Plans in respect of the historic environment.

Local Plans need to:

- 1 be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area – which would include the historic environment. In particular this up-to-date evidence should be used to assess the significance of heritage assets and the contribution they make to the environment (NPPF Paragraphs 158 and 169)
- 2 set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 126 and 157)
- 3 contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156), **and**
- 4 identify land where development would be inappropriate because of its (environmental or) historic significance (NPPF, Paragraph 157)

Gathering evidence

4 When gathering evidence, it is important to bear in mind that this is not simply an exercise in setting out known sites but, rather, in understanding the value to society (ie the significance) of sites both known (such as those on the National Heritage List for England, see www.HistoricEngland.org.uk/listing/the-list) and potential, without which an understanding of the sometimes subtle qualities of the local distinctiveness and character of the local area may be easily lost. In particular:

- In some cases, it might be necessary to identify heritage assets outside a local authority area, eg where there are likely to be setting impacts caused by potential development proposals within that area
- Some asset types are not currently well-recorded. *The Register of Parks and Gardens of Historic Interest in England*, for example, is thought to represent only around two-thirds of sites potentially deserving inclusion
- Evidence gathering can help identify parts of a locality that may be worthy of designation as a Conservation Area, or may merit local listing
- Assessing the likelihood of currently unidentified heritage assets being discovered, particularly sites of historic and/or archaeological interest, will help to future proof the plan

5 It may be helpful to collate this information within a Heritage Topic Paper to draw together the evidence prepared and the subsequent implications and actions required.

Sources of evidence

6 Sources of evidence to assist in gathering information include:

- the National Heritage List for England: www.HistoricEngland.org.uk/listing/the-list
- the Heritage Gateway: www.heritagegateway.org.uk/gateway/
- Historic Environment Record (HER): local planning authorities should either maintain or have access to a Historic Environment Record (NPPF, Paragraph 169) – see Heritage Gateway to find your local HER
- Conservation Area Appraisals and Management Plans – see relevant pages of the local authority website(s)
- Local Lists – as above
- National and local ‘Heritage at Risk’ registers: www.HistoricEngland.org.uk/advice/heritage-at-risk
- Historic characterisation assessments – see Heritage Gateway to find your local HER
- World Heritage Site Management Plans – see relevant pages of the local authority website(s)
- In-house and local knowledge and other expertise (ie civic societies, local history groups, neighbourhood consultations, the Civic Voice: www.civicvoice.org.uk/)

7 Where the evidence base for the historic environment is weak, local planning authorities may need to commission proportionate research, for example:

- detailed historic characterisation work assessing the impact of a proposal for a major urban extension or rural development
- visual impact assessments, considering the potential impact of allocations upon the setting of important heritage assets
- seeking the views of the local community about what they value about the historic environment of their local area (NPPF, Paragraph 155)
- an appropriate archaeological assessment to consider whether heritage assets with archaeological potential are likely to be present in areas where the HER indicates that there has been little or no previous investigation

8 Work in putting together Local Plans will often generate new evidence of the state and significance of the historic environment. Documents, such as historic landscape characterisations, strategic environmental assessments, conservation area appraisals, economic development studies and those supporting supplementary planning documents and local listing assessments, will often contain new evidence. Local planning authorities will find it useful to collect this information and make it publicly available, including through the Historic Environment Record. The information can be invaluable in improving plan-making and decision-making in the future and is of significant public benefit in furthering the understanding of our surroundings and our past.

Application of evidence

9 The evidence base for the historic environment may also assist with the preparation of the following:

- assessments developed to meet the goal of achieving economic, social and environmental gains jointly and simultaneously, ie through land availability, etc (NPPF, Paragraph 8)
- the Sustainability Appraisal which accompanies the Local Plan, **and**
- appropriate indicators for monitoring the delivery of the plan

A positive strategy for conservation and enjoyment of the historic environment

10 A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

11 This strategic approach can inform all aspects of the planning system by recognising and reinforcing the historic significance of places. As part of a sound conservation strategy, policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF expects (NPPF, Paragraph 8). Conservation is certainly not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives.

12 Consequently, the Local Plan might need to consider the inter-relationship of the objectives for the historic environment with the following:

- **Building a strong, competitive economy**
 - How might the plan conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment? What opportunities are there for heritage-led regeneration?
- **Ensuring the vitality of town centres**
 - What role can the historic environment play in increasing the vitality and attractiveness of town and village centres?
- **Supporting a prosperous rural economy**
 - What opportunities does the reuse or adaptation of traditional buildings provide for supporting the rural economy or providing homes for local people? What potential is there for new heritage-led tourism initiatives?
- **Promoting sustainable transport**
 - How might new roads and other transport infrastructure be delivered in a manner which also conserves the historic environment of the area? Could the introduction of sustainable transport initiatives offer related opportunities for heritage through improving street/traffic management or public realm enhancement at the same time?
- **Delivering a wide choice of high quality homes**
 - How might the plan encourage adaptive reuse of historic buildings? How might new residential developments best be integrated into historic areas?
- **Requiring good design**
 - How might the defining characteristics of each part of the plan area be reinforced in the approach to design?
- **Protecting Green Belt land**
 - How might the policies for the Green Belt and the definition of its boundaries be tailored to protect the special character and setting of a historic town?
- **Meeting the challenge of climate change, flooding and coastal change**
 - How might flood prevention measures be provided which also safeguard the heritage assets in the area? How might the strategy for renewable energy developments and associated infrastructure reduce the potential harm to the historic environment?
- **Conserving and enhancing the natural environment**
 - How might the plan best identify, protect and enhance important historic landscapes? What contribution might the strategy for improving the Green Infrastructure network also make to the enhancement of the area's heritage assets?
- **Facilitating the sustainable use of minerals (see box)**
 - How might any impacts of mineral development on an area's heritage assets be controlled to acceptable levels? How might the plan safeguard potential sources of building and roofing stone, or improve archaeological knowledge through approved mineral operations?

Further advice is available in *Mineral Extraction and Archaeology: A Practice Guide*, English Heritage on behalf of the Minerals Historic Environment Forum, 2008. As this predates the NPPF, the document is currently under revision.

13 In formulating the strategy it is advisable and often necessary to consider the following factors:

- How the historic environment can assist the delivery of the positive strategy and the economic, social and environmental objectives for the plan area (NPPF, Paragraphs 126 and 132 and Sections 66 and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990)
- How the plan will address particular issues identified during the development of the evidence base, including heritage at risk and the reuse of buildings
- The location, design and use of future development and how it can contribute to local identity and distinctiveness
- The interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, social and cultural assets, town centres and climate change mitigation/adaptation (NPPF, Paragraph 126)
- The means by which new development in and around World Heritage Sites and other designated heritage assets might enhance or better reveal their Outstanding Universal Value and significance (NPPF, Paragraph 137)
- The means by which new development in Conservation Areas and within the setting of heritage assets might enhance or better reveal their significance (NPPF, Paragraph 137)
- How [Article 4 Directions](#) may be employed to provide an additional conservation mechanism
- How HERs and local lists might assist in identifying and managing the conservation of non-designated heritage assets
- How the archaeology of the plan area might be managed
- The possible role for CIL and/or s106 in delivery of required infrastructure
- Whether master plans or design briefs need to be prepared for significant sites where major change is proposed
- What implementation partners need to be identified in order to deliver the positive strategy
- What indicators should be used to monitor the heritage strategy's effectiveness
- In order to deliver an effective strategy for the conservation of the historic environment, is there a need for the plan to include Development Management Policies and where appropriate specific policies for specific assets or specific areas within the plan area?

Strategic policies for the conservation of the historic environment

14 The plan will be the starting point for decisions on planning applications and neighbourhood plans are only required to be in general conformity with the strategic policies of the Local Plan (NPPF, Paragraph 184). Consequently, sustainably managing the historic environment is best achieved by identifying clear strategic policies for heritage, in order to assist those preparing neighbourhood plans.

Identifying inappropriate development

15 The local plan needs to assess whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157). This might include, for example, tall buildings within identified view corridors.

Development Management Policies for the historic environment

16 Specific Development Management Policies may be needed in order for decision-takers to determine how they should react to an application affecting a heritage asset. Such circumstances could include the following:

- Those areas where Development Management Policies are necessary to amplify a general, overarching, Strategic Policy for the historic environment within a Core Strategy of the Local Plan – for instance, to deal with particularly distinctive or important historic environment features or significance
- Those areas where further clarity would be useful – for instance, how local planning authorities determine applications affecting archaeological remains of less than national importance
- Those areas where Development Management Policies may be necessary to address the local circumstances of the Plan area - for example, to clarify the approach to development within an Area of Archaeological Importance (see box), or to protect or enhance important views and vistas

- Those circumstances where Development Management Policies are needed to address particular cross-boundary issues – such as World Heritage Sites, National Parks and Areas of Outstanding Natural Beauty whose management is carried out by joint working between several local planning authorities or the management of those extensive historic landscapes which run across a number of authority areas

Sections 33-35, Ancient Monuments and Archaeological Areas Act, 1979. For further information see www.HistoricEngland.org.uk/advice/hpg/has/archaeologicalimportance/ although it should be noted that only five such areas have ever been designated.

Site allocations

17 A conservation strategy can help with site allocations in terms of considering environmental and policy constraints against the evidence in the relevant Strategic Housing Market Assessment (Planning Minister's letter to Chief Planners 19 December 2014 www.gov.uk/government/publications/strategic-housing-market-assessments).

18 It can identify opportunities to conserve the historic environment, such as site allocations positively addressing heritage assets at risk, and can help to ensure that site allocations avoid harming the significance of heritage assets (including effects on their setting). The strategy can also be used to inform the nature of allocations so development responds to and reflects local character. Site allocations should be informed by an evidence base and an analysis of potential effects on heritage assets. Further advice will be available in the forthcoming Historic England Advice Note on heritage considerations for site allocations in local plans.

Planning across boundaries

19 Conservation of the historic environment may involve cross-boundary issues, where development proposals near the boundary of one local authority area potentially affect the setting of heritage assets in another. In such cases in exercising the Duty to Cooperate both authorities need to take into account the impact on the conservation and enhancement of the historic environment as one of the strategic priorities (NPPF, Paragraphs 156 and 178).

Cumulative impact

20 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 development. Consequently LPAs may consider covering this issue in a specific Local Plan historic environment policy. In appropriate circumstances this policy could be delivered via an Article 4 Direction in a conservation area.

Nationally Significant Infrastructure Projects

21 There is a separate planning regime for Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008. See <http://infrastructure.planningportal.gov.uk/> for further details.

Marine Planning

22 Some authorities have coastal boundaries and consideration will need to be given to marine heritage which may arise and the points above will equally apply. In England marine planning is administered by the Marine Management Organisation (MMO). For further details see: www.gov.uk/government/collections/marine-planning-in-england#about-marine-planning

Community Infrastructure Levy (CIL)

23 When preparing a CIL Charging Schedule, local authorities may wish to take account of any impacts of proposed levy rates on the economic viability of the re-use of heritage assets and heritage led regeneration projects.

Section 106 agreements

24 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. Subject to meeting the policy tests in paragraph 204 of the NPPF, types of contribution might include:

- repair, restoration or maintenance of a heritage asset(s) and their setting
- increased public access and improved signage to and from heritage assets
- interpretation panels/historical information and public open days
- production and implementation of up-to-date Conservation Area management plans and appraisals
- measures for investigation, preservation and display of archaeological remains and sites
- provision of local capacity for the storage of, and public access to, archives resulting from archaeological and/or historical investigation
- dissemination of historic environment information for public/school education and research, including museum displays for popularisation of archaeological discoveries
- sustainability improvements (such as loft insulation) for historic buildings

- public realm obligations, including enhancement of historic squares and spaces, registered parks and gardens, historic pavement materials, street furniture, removal of street clutter and installation of sympathetic lighting, etc

Infrastructure Delivery Plans

25 Investment in infrastructure could assist in the delivery of the plan’s strategy for the historic environment. For example:

- Open space, including wider public realm improvements for historic streets and squares
- Repairs and improvements to and the maintenance of heritage assets, including transport infrastructure such as historic bridges and stations, green and social infrastructure such as parks & gardens and sporting or recreational facilities
- ‘In kind’ payments, including land transfers

Supplementary Planning Documents (SPDs)

26 A heritage SPD brought forward 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 and some local planning authorities may choose to support their conservation strategy within the Local Plan using a topic-specific SPD. There may be heritage considerations in other types of SPDs, for example flood management.

Strategic Environmental Assessments (SEA)/Sustainability Appraisals (SA)

27 In identifying the significant environmental effects that are likely to occur, an SEA/SA will recommend an appropriate response to the conservation and enhancement of the historic environment. English Heritage published revised [advice on preparing SEA/SAs](#) in 2013.

Neighbourhood Plans

28 A full and proper understanding of the heritage of the local area is the most appropriate starting point for town and parish councils and neighbourhood forums to both propose boundaries of the neighbourhood plan area and develop policies that support and encourage the conservation and enhancement of the historic environment.

29 Including heritage matters in a neighbourhood plan will help ensure that new development is integrated with what is already exists and can demonstrate where standard design and construction may not be appropriate. This can encourage sensitive development of historic buildings and places that can invigorate an area.

30 Draft neighbourhood plans, neighbourhood development orders and community right to build orders have to meet certain general ‘basic conditions’ before they can be put to an independent examination (having regard to legislation, national policies and advice, being in general conformity with strategic local policies; contributing to the achievement of sustainable development and being compatible with EU obligations and Human Rights).

Neighbourhood development orders and community right to build orders must also meet additional conditions relating specifically to heritage assets through:

- having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, **and**
- having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area (Schedule 4B of the Town and Country Planning Act 1990 (Schedule 10 of the Localism Act))

31 Attention is also drawn to national policies and advice on the historic environment, such as that contained in the NPPF and the [DCMS Statement on Scheduled Monuments & Nationally Important but Non-Scheduled Monuments](#).

32 Plans need to include enough information about local heritage to guide decisions, in particular, what it is about a local area that people value, and therefore, requires conservation and enhancement. That information will need to be based on robust evidence, such as the relevant HER. Historic England has published [advice to assist local communities considering a neighbourhood plan](#).

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Historic England

Managing Significance in Decision-Taking in the Historic Environment

Historic Environment Good Practice Advice in Planning: 2



This document was produced by Historic England in collaboration with the Historic Environment Forum, and with the particular assistance of:

Association of Local Government Archaeological Officers

British Property Federation

Council for British Archaeology

Chartered Institute for Archaeologists

Country Land and Business Association

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Historic Houses Association

Historic Towns Forum

Institute of Historic Buildings Conservation

National Trust

It is one of three related Good Practice Advice (GPA) Notes, along with GPA1 *The Historic Environment in Local Plans* and GPA3 *The Setting of Heritage Assets*.

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Introduction

1 The purpose of this Historic England Good Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the **National Planning Policy Framework (NPPF)** and the related guidance given in the **Planning Practice Guidance (PPG)**. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

2 This good practice advice acknowledges the primacy of relevant legislation and the NPPF and PPG, and is intended to support the implementation of national policy. It does not however constitute a statement of Government policy, nor does it seek to prescribe a single methodology or particular data sources. In order to gain a full understanding of the relevant issues, this document should be read in conjunction with the relevant legislation, national planning policy and guidance (the NPPF and PPG), as well as Good Practice Advice Note 1 (*The Historic Environment in Local Plans*) and Good Practice Advice Note 3 (*The Setting of Heritage Assets*) and other Historic England Advice Notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.

3 The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.

General advice on decision-taking

4 Development 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 first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. A variety of terms are used in designation criteria (for example, outstanding universal value for World Heritage Sites, national importance for scheduled monuments and special interest for listed buildings and conservation areas), but all of these refer to a heritage asset's significance.

5 Heritage assets include designated heritage assets and non-designated assets identified by the local planning authority as having a significance justifying consideration in a planning decision (NPPF glossary, page 52). The National Heritage List for England is the official database of all nationally designated heritage assets – see www.HistoricEngland.org.uk/listing/the-list. Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application. Archaeological potential should not be overlooked simply because it is not readily apparent.

6 Both the NPPF (paragraph 188) and the PPG (section ID20) highlight early engagement and pre-application discussion. Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice, and then to engage in pre-application discussion with the local planning authority and their heritage advisers to ensure that any issues can be identified and appropriately addressed. As part of this process, these discussions and subsequent applications usually benefit from a structured approach to the

assembly and analysis of relevant information. The stages below indicate the order in which this process can be approached – it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate:

For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary.

- 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
- 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 assessment of significance as part of the application process

7 Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process is very important to an applicant in order to conceive of and design a successful development and to the local planning authority in order to make decisions in line with legal requirements and the objectives of the development plan and the policy requirements of the NPPF.

8 Understanding the **nature of the significance** is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

9 Understanding the **extent of that significance** is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

10 Understanding the **level of significance** is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives.

11 To accord with the NPPF, an applicant will need to undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.

12 Although there are many sources of information and methods for assessing significance and impact upon it, the most common steps an applicant might take are as follows. The first three steps are almost always necessary:

- 12.1 Examine the asset and its setting (see GPA 3).
- 12.2 Check:
 - a the Local Development Plan, evidence base and policies
 - b main local, county and national records including the relevant Historic Environment Record (see [paragraph 21](#)),
 - c statutory (these can be accessed via the [National Heritage List for England](#)) and local lists
 - d the [Heritage Gateway](#)
 - e the [Historic England Archive](#), and
 - f other relevant sources of information that would provide an understanding of the history of the place and the value the asset holds for society, for example historic maps, conservation area appraisals, townscapes studies or the urban archaeology database
- 12.3 Consider whether the nature of the significance of the affected assets requires an expert assessment to gain the necessary level of understanding; where there is archaeological interest (including buildings, areas and wreck sites), consider whether it requires a desk-based assessment to understand the significance. It is good practice to use professionally accredited experts and to comply with relevant standards and guidance. To find a list of expert groups, see [paragraph 19](#).

A **desk-based assessment** will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so. See the relevant [standards and guidance](#) provided by the Chartered Institute for Archaeologists (CIfA).

CIfA Standard and Guidance: Historic Environment Desk Based Assessment 2014

- 12.4 In order to ensure that the scope of the assessment or evaluation meets the requirements of the local planning authority (LPA) and avoids the risk of damage to heritage assets, it is good practice to discuss the scope of the work with the LPA in advance and to agree a written scheme of investigation (WSI), if necessary, before commencement, thus precluding abortive work.
- 12.5 Carry out additional investigations if initial research has established an archaeological, architectural, artistic, and/or historic interest but where the extent, nature or importance needs to be established more clearly before decisions can be made about change to the site. This may include documentary research.

For example, see *Understanding Place: An Introduction*, *Understanding Place: Historic Area Assessments in a Planning and Development Context*, *Understanding Place: Historic Area Assessment – Principles and Practice* (all 2010: English Heritage).

- 12.6 Where an archaeological desk-based assessment is insufficient to assess the archaeological interest of a heritage asset fully, consider whether an on-site field evaluation would provide the necessary information.

An **archaeological field evaluation** will determine, as far as is reasonably possible, the nature of the archaeological resource within a specified area using appropriate methods and practises, including: geophysical survey, physical appraisal of visible structures and/or trial trenching for buried remains.

CIfA Standard and Guidance: Evaluation.

See also *Mineral Extraction and Archaeology: A Practice Guide*, English Heritage on behalf of the Minerals Historic Environment Forum, 2008.

- 12.7 Consider, in the case of buildings, whether physical intervention such as the selected removal of non-historic plaster, may be helpful to reveal important details hidden behind later additions and alterations bearing in mind that such investigations should be proportionate to the significance. Most evaluation of significance in buildings is likely to be based on a mixture of documentary research and non-intrusive examination of fabric but where the significance lies below-ground or more deeply concealed in a building's fabric, a greater level of intrusive investigation may be required.

For further information on the investigation of historic buildings, see *Understanding Historic Buildings: A Guide to Good Recording Practice* (2006), *Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities* (2008 - both English Heritage) and CIfA Standard and Guidance: *Archaeological Investigation and Recording of Standing Buildings or Structures*.

- 12.8 Establish whether any investigative work may itself require listed building consent, scheduled monument consent or other permissions.

Conservation Principles and assessment

13 The reason why society places a value on heritage assets beyond their mere utility has been explored at a more philosophical level by English Heritage in *Conservation Principles* (2008). *Conservation Principles* identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. Heritage values can help in deciding the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.

14 Assessment of significance, on a UK wide basis, is also covered in Part 4 of British Standard 7913:2013 *Guide to the Conservation of Historic Buildings*.

Curtilage structures

15 Some buildings and structures are deemed designated as listed buildings by being fixed to the principal building or by being ancillary within its curtilage and pre-dating 1 July 1948. Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (ie the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance. **Listed buildings** designated very recently (after 25 June 2013) are likely to define curtilage definitively; where this is (or is not) the case will be noted in the list description.

Archaeological and historic interest

16 Archaeological interest, as defined in the NPPF, differs from historic interest because it is the prospects for a future expert archaeological investigation to reveal more about our past that need protecting. Caring for an asset that has a well-understood historic interest, but no substantial archaeological interest, will be relatively straightforward as our existing knowledge of the asset will guide how it can be managed in order to sustain its significance. However, if for example there is good reason to suspect that a bare field which has never been investigated contains important remains, or that an apparently ordinary building contains a hidden medieval timber-frame, the task of managing it would be different.

Historic interest is an interest in what is already known about past lives and events that may be illustrated by or associated with the asset.

17 Where a heritage asset is thought to have archaeological interest, the potential knowledge which may be unlocked by investigation may occasionally be harmed by even minor disturbance, thus damaging the significance of the asset. This can make some assets, or parts of them, very sensitive to change. Expert advice will be needed to identify these sensitivities and assess whether and how they can be worked around (see [paragraphs 20 - 23](#)), however, a proportionate approach should be maintained. It has been estimated that disturbance would have an adverse impact in less than 3% of all planning applications currently (Information from forthcoming ALGAO casework survey (to be published summer 2015)).

The archaeological interest of an asset can remain even after apparently thorough investigation. As techniques and the understanding of our past improve, a previously investigated asset may be revisited to see what further can be learned.

Using appropriate expertise

18 Expert advice on where the significance lies and its sensitivity to change can unlock viable uses for the asset and secure its long-term future. It can also be very valuable in minimising and mitigating impact, therefore avoiding conflicts between the owner's reasonable aspirations for the site and its conservation, particularly if it is sought early. Where the proposal is likely to affect the significance of heritage assets, early engagement with appropriate expert advice and the relevant local authority heritage advisers will be helpful both in developing an understanding of significance and in identifying the level of information needed to support the application and can be helpful throughout the process. National amenity societies and local groups, such as civic and historical societies, museums and local records/archives can also be particularly valuable sources of advice and information. Where a heritage asset may have a cultural or faith interest to a particular community, it is important to consult them as their views and information may add to the understanding of the asset's significance.

19 There are several established registers that can be used to identify appropriately qualified specialists or organisations, depending on the nature of the project. Though not exhaustive, the alphabetical list below may be helpful:

Architects Accredited in Building Conservation Ltd operates a register of specialist architectural heritage expertise.

The **Chartered Institute for Archaeologists (CIfA)** has a register of accredited organisations for historic environment practice. CIfA requires its members to meet defined levels of competence. www.archaeologists.net/ro

The **Institution of Civil Engineers and the Institution of Structural Engineers** operate a joint register of engineers (Conservation Accreditation Register for Engineers - CARE) who have demonstrated to their peers that they meet a required standard in conservation.

The **Institute for Conservation (ICON)** operates a register of accredited conservator-restorers.

The **Institute of Historic Building Conservation (IHBC)** has a register of accredited organisations for historic environment practice. The IHBC requires its members to meet defined levels of competency. www.ihbc.org.uk/hespr/

The **Royal Institute of British Architects** also operates a register of architects accredited in building conservation, for works on listed buildings, scheduled monuments and pre-1900 buildings.

The **Royal Institution of Chartered Surveyors** maintains a register of accredited building conservation surveyors.

20 Some projects may need more than one type of specialist and, indeed, others, for instance planners and architectural historians.

Finding appropriate information: Historic Environment Records (HERs)

21 To ensure sustainable development, local planning authorities need to have access to HERs that are publicly-accessible and dynamic sources of information about the local historic environment, its archaeological remains, architecture and town- and landscape of all periods. They need to provide an up-to-date catalogue of heritage assets and interventions within a defined geographical area. They will assist in informing good planning decisions by providing information about the historic environment, complementary to that provided by museums, archives and libraries, to communities, owners and developers. As an information service managed by dedicated specialist staff, they consist of databases, indexes and reference collections linked to a Geographical Information System (GIS) and thus provide core information for plan-making, designation and development management decisions in the planning system as set out in the NPPF, as well as decisions relating to environmental stewardship schemes (details can be found at: www.heritagegateway.org.uk/Gateway/CHR).

22 An effective HER is likely to contain information on the following:

- 22.1 Designated heritage assets.
- 22.2 Locally designated heritage assets.
- 22.3 Heritage assets with archaeological interest that are neither nationally nor locally designated (including assets that are known to have been demolished or destroyed or known only from antiquarian sources, assets which do not meet the criteria for national or local designation, and those which have yet to be formally assessed as such).

- 22.4 Other heritage assets with historic, architectural and artistic interest that are of local significance (including undesignated historic buildings, parks and gardens and historic places commemorating events and people).
- 22.5 Findspots.
- 22.6 Archaeological objects and their findspots under the Portable Antiquities Scheme.
- 22.7 Investigations of the archaeological, architectural, historic or artistic interest of a place or landscape, including desk-based assessments, field evaluations, excavation reports, archaeological watching briefs, environmental assessments, conservation management plans and assessments, reports on significance from Design and Access Statements, record reports on buildings, conference notes and proceedings, etc.
- 22.8 Historic area assessments and characterisation studies, urban archaeological databases, conservation area appraisals and management plans.
- 22.9 Output from the National Mapping Programme (NMP).
- 22.10 Scientific data relevant to the understanding of heritage assets such as borehole logs, absolute dating and palaeoenvironmental data.
- 22.11 Documentation, such as Listed Building Heritage Partnership Agreements, Local Listed Building Consent Orders and (National) Listed Building Consent Orders, which derive from changes to the Planning (Listed Building and Conservation Areas) Act 1990 under the Enterprise and Regulatory Reform Act 2013.

23 HERs will usually be defined by the administrative boundaries (whether terrestrial, inter-tidal or marine) of the local authority(-ies) that an HER covers. To ensure useful coverage in all types of planning casework, HERs are encouraged to consult user groups regularly and take account of their information requirements in sourcing material.

24 Information generated in putting together the local plan, during the process of applying for consent and in the discharging of conditions placed on consents will often provide new evidence of the state and significance of the historic environment. It can be invaluable in plan-making and decision-making in the future and is of significant public benefit in furthering the understanding of our surroundings and our past. This information should be made publicly accessible, usually through the Historic Environment Record.

Assessing the proposals

25 In deciding applications for planning permission and listed building consent, local planning authorities will need to assess the particular significance of the heritage asset(s) which may be affected by the proposal and the impact of the proposal on that significance reflecting the approach as described in paragraphs 3-5 above. In most cases, to assess significance LPAs will need to take expert advice, whether in-house, from shared services or from consultants. It is good practice to use professionally accredited experts and to comply with relevant standards and guidance (For example, the ClfA Standard and Guidance: *Archaeological Advice*). To find a list of expert groups, see [paragraph 19](#).

26 Successful sustainable development achieves economic, social and environmental gains jointly and simultaneously through planning decisions (NPPF, Paragraph 8). If there is any apparent conflict between the proposed development and the conservation of a heritage asset then the decision-maker might need to

consider whether alternative means of delivering the development benefits could achieve a more sustainable result, before proceeding to weigh benefits against any harm. For example, raft foundations can span archaeological deposits, so minimising both the physical impact and the costs associated with excavation.

27 Substantial harm is a high test which may not arise in many cases. In those cases where harm or loss is considered likely to be substantial (NPPF, Paragraph 132 & PPG 01-7), then the LPA will need to consider the relevant NPPF tests. Further detail on the tests on levels of harm can be found at paragraphs 133-135 and 139 of the NPPF. Further guidance on heritage conservation as a public benefit in itself, optimum viable use, levels of harm and mitigating harm are given in the PPG section ID 18a, paragraphs 15 to 20.

Cumulative impact

28 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. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape.

Listed building consent regime

29 Change to heritage assets is inevitable but it is only harmful when significance is damaged. 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 needed if it is to go ahead. In the case of listed buildings, the need for owners to receive listed building consent in advance of works which affect special interest is a simple mechanism but it is not always clear which kinds of works would require consent. In certain circumstances there are alternative means of granting listed building consent under the Enterprise & Regulatory Reform Act 2013.

Further advice is given in Historic England Advice Note *Making Changes to Heritage Assets* (forthcoming).

For the Enterprise and Regulatory Reform Act 2013 see: www.legislation.gov.uk/ukpga/2013/24/contents/enacted

Decision-taking for assets with archaeological interest

30 Many heritage assets have a significance that is a combination of historic, architectural, artistic and archaeological interest. However, some will currently hold only an archaeological interest, in that nothing substantial may be known about the site and yet there is a credible expectation that investigation may yield something of strong enough interest to justify some level of protection.

31 For sites with archaeological interest, whether designated or not, the benefits of conserving them are a material consideration when considering planning applications for development.

Recording and furthering understanding

32 If a decision in principle is made to allow a proposal that would cause the loss of an asset (either wholly or in part), developers are required to record and advance our understanding of the significance of the asset or the relevant part in a manner proportionate to its importance and the potential impact (NPPF, Paragraph 141). Nevertheless, records cannot deliver the sensory experience and understanding of context provided by the original heritage asset, so the ability to investigate and record a heritage asset is not a factor in deciding whether consent for its destruction should be given.

33 Developers are more likely to achieve the NPPF objective if the recording is undertaken by a professionally accredited organisation or individual with appropriate expertise and that it complies with professional standards and guidance and takes account of relevant research frameworks.

Accredited members:

The ClfA maintains a Register of accredited organisations and holds a directory of members:

www.archaeologists.net/ro

Guidance:

ClfA Standard and Guidance: *Evaluation; Watching Briefs; Archaeological Excavation and Archaeological Investigation and Recording of Standing Buildings or Structures.*

Mineral Extraction and Archaeology: A Practice Guide, English Heritage on behalf of the Minerals Historic Environment Forum, 2008.

Understanding Historic Buildings: a guide to good recording practice. English Heritage 2006.

Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities English Heritage 2008.

Local authority archaeological advisers may have additional, locally specific guidance.

Research Frameworks:

See: www.HistoricEngland.org.uk/research/support-and-collaboration/research-resources/research-frameworks/

Written Schemes of Investigation (WSI)

34 In those cases where development will lead to loss of a substantive part of the significance of a heritage asset, the steps to be taken by the developer to achieve the NPPF requirements are best controlled through a WSI, although given the number of planning applications likely to have an adverse impact such an investigation may not be required in many cases. A WSI is usually commissioned by the applicant and approved by the LPA. The planning authority will need to satisfy itself that any WSI is set out to a level of detail proportionate to the asset's likely significance and in accordance with appropriate standards and is flexible enough to be able to take account of reasonable and unavoidable changes or unexpected discoveries. WSIs are used to set out proposals for assessment and evaluation, as well as post-permission investigation and recording.

35 The LPA (and their heritage advisers) can advise as to what the WSI should cover; additional guidance is also available, for example through ClfA standards and guidance. Schemes normally include:

- Background information and context relating to existing understanding and the purpose of the investigation
- Proposals for the site investigation, including statements on research objectives, methodology and community engagements
- Proposals for the assessment, analysis, publication, dissemination, archiving and curation of the results of the investigation. Assessment and analysis may need to be a two stage process with detailed proposals for investigation and analysis being agreed following completion of the assessment stage

- Operational matters including timetable, resourcing, expertise of those undertaking the work, compliance with professional standards and legislative or regulatory requirements

Archaeological conditions and obligations for WSIs

36 A requirement to record the significance of a heritage asset with archaeological interest that will be harmed may be made enforceable through conditions, a planning obligation or a combination of the two (see Paragraphs 203-206 of the NPPF). The use of conditions or obligations can be applied where the legal and policy tests in the NPPF have been met, and it has been established that sustainable development can only be achieved through harm to a heritage asset. An approach for using conditions to identify and secure the appropriate level of work is set out below. Depending on the nature of the proposals and the heritage assets affected, the timing of submission of details relating to works (ie in this case the WSI), their approval and implementation may need to be tied to the phases of development or occupation. Information requirements should also be tailored to the development.

37 The following is suggested as an example condition which can be helpful to identify and to secure the appropriate level of work that is necessary before commencement of the development, and also what may be required after commencement and in some cases after the development has been completed. The staged approach to discharge can therefore help to avoid problems for developers with the delay of fully discharging pre-commencement conditions such as where lengthy programmes of archaeological work are secured by a single clause pre-commencement condition. Care will be needed to ensure the conditions are enforceable and otherwise comply with the NPPF. A planning obligation may be needed in certain circumstances:

- No demolition/development shall take place/commence until a written scheme of investigation (WSI) has been [submitted to and] approved by the local planning authority in writing. For land that is included within the WSI, no demolition/development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, **and**
- The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Reporting, publication and archiving

38 Where the local planning authority has indicated that a report detailing the findings of the investigation shall be published, it is helpful to consider the following points:

- The best means of publication to reach target audiences, dependent upon the nature of the findings
- For important sites, the publication of detailed findings to an appropriate and proportionate level through books, archaeological, architectural or historical journals or via the internet
- The general structure, length and format of the report including summaries

39 Local planning authorities are advised to ensure that the compilation, deposition and appropriate conservation of the material, digital and documentary archive in a museum, or other publicly accessible repository willing and capable of preserving it, forms an integral part of any recording project. Securing the archive of an investigation according to the terms of deposition or guidelines issued by the receiving body will facilitate future research. Proposals for these stages of work will have been included in the WSI but may need to be updated following completion of the on-site investigation.

40 The ClfA publishes standards and guidance for the creation, compilation, transfer and deposition of archaeological archives (ClfA Standard and Guidance: *Archives*), while advice is also available from the Museums Association and individual museums and archives. Deposition of copies of reports and site summaries with the HER is vital in providing an evidence base that can be called on by applicants for future development and by planners when drawing up plans and making decisions, as well as being important to local communities. Advice on the content of site summaries may be available from the HER.

Human remains

41 There are important, additional legal requirements that apply where development or on-site evaluation may affect human remains and it is advisable to follow established professional guidelines. Further guidance on compliance with burials legislation is available from the Ministry of Justice and [Historic England](#).

Mineral extraction

42 Archaeological interest is often of particular importance in proposals for minerals extraction. The Minerals and Historic Environment Forum has published *Mineral Extraction and Archaeology: a Practice Guide* (2008) to provide guidance on minerals planning and archaeology. This is currently being updated given the subsequent publication of the NPPF.

Public engagement

43 Where appropriate, local planning authorities and the developer are advised to consider the benefits of making the investigative works open to and interpreted for the public and to include that as part of the WSI. The results can contribute to a deeper sense of place, ownership and community identity. Promoting understanding will increase active protection for the historic environment. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

Unexpected discoveries during work

44 Where a new heritage asset is discovered or an existing known asset proves to be more significant than foreseen at the time of application, the local planning authority is advised to work with the developer to seek a proportionate solution that protects the significance of the new discovery, so far as is practical, within the existing scheme. Developers are advised to incorporate the potential for unexpected discoveries into their risk-management strategies.

Scheduled monument consent

45 [Guidance on scheduling and scheduled monument consent](#) is published by DCMS. Scheduled monument consent is a separate approval process from the planning system.

Neglect

45 While most disrepair is not deliberate neglect, and while LPAs need to be wary of delaying sympathetic proposals which would give the heritage asset a future, where an owner appears to have permitted a heritage asset to deteriorate deliberately in the hope of making consent or permission easier to gain, the local planning authority will need to disregard the deteriorated state of the asset. In all other cases the condition of the property and its impact on viability can be a material consideration.

46 Working with the owner is the route to solving heritage at risk issues and informal approaches to the owner are the normal starting point. LPAs may need to consider exercising their repair and compulsory purchase powers to remedy neglect, deliberate or otherwise (NPPF, Paragraphs 126 and 207). The potential to exercise these powers as an alternative means of conserving a heritage asset could be a material consideration in determining applications (see: [Stopping the Rot: A Guide to Enforcement Action to Save Historic Buildings](#)).

Unauthorised works, enforcement notices and prosecution

47 The objective of conserving heritage assets for generations to come will not be met if there is no deterrent to those contemplating not applying for a consent and no remedy applied when consents are not sought when they should have been. Wrongdoing should obviously not be rewarded and those who obey the law should not be disadvantaged. Local planning authorities may, where it is expedient and in the public interest, consider the following steps, as appropriate: to remind people of the need for consents; to investigate and prosecute breaches of the law; and, to remedy the effects of any wrongdoing using their enforcement powers. The strategy for enforcement in the historic environment would form part of the 'local enforcement plan' (NPPF, Paragraph 207).

48 Carrying out works that affect the special interest of a listed building and the demolition of a building in a conservation area without consent are both criminal offences. Expert heritage advice should be sought if there is any doubt as to whether consent should be obtained and, if in doubt owners are encouraged to talk to their LPA before works are undertaken. Although scheduled monument consent is a separate regime, unauthorised works are a criminal offence under the Ancient Monuments and Archaeological Areas Act 1979.

Marketing to demonstrate redundancy

49 Excepting those which, by their nature, have limited or no economic end use, total loss or substantial harm to a designated heritage asset may be justified where certain conditions apply (NPPF, Paragraph 133). Marketing is required to demonstrate redundancy as expert evidence of possible purchasers and their intended uses for the site can never be conclusive and the seriousness of the proposed harm justifies the time taken in the marketing exercise (See section 4.7 of *Enabling Development and the Conservation of Significant Places* – English Heritage, 2008).

50 No-one is obliged to sell their property. The aim of a marketing exercise is to reach all potential buyers who may be willing to find a use for the site that still provides for its conservation to some degree. If such a genuine purchaser comes forward who would be willing to maintain the asset, there is no obligation to sell to them, of course, but redundancy will not have been demonstrated. To ensure that those marketing efforts have been genuine and given the best chance of succeeding, local planning authorities may consider the following aspects of the campaign in order to judge its merits:

- a **The timing of the marketing.**
Paragraph 133 of the NPPF requires that there is clear evidence that no viable use can be found in the 'medium term'. Under poor market conditions the applicant may wish to consider whether 'mothballing' the asset might be appropriate until conditions have improved to the point when a negative response can be reasonably ascribed to a genuine lack of interest in the asset itself rather than to general market conditions.
- b **The period and means of marketing.**
These will be set to give the best chance of reaching all categories of potential purchaser.

- c **The asking price.**
A price that does not fairly reflect the market value of the heritage asset will deter enquiries.
- d **Condition of the site and deliberate neglect.** To test the market adequately the price would need to reflect the cost of any works needed to repair the asset. Deterioration from deliberate neglect of the asset in the hope of obtaining consent should be ignored. This means that if the cost of making good the deterioration from deliberate neglect is greater than any value the site may have had without the neglect, the applicant is unlikely to be able to demonstrate that the asset would have been unviable in the assumed condition that the policy requires.
- e **The extent of the land included and nature of the interest being marketed.**
The land being offered needs to be sufficient to provide necessary infrastructure; if a lease rather than freehold is offered and it is too short or has otherwise onerous terms genuine interest may be deterred.

Public or charitable interest and support for assets under threat

51 Where there are no expressions of interest in the general market for maintaining the asset, reasonable endeavours will need to be made to see if there is a public or charitable organisation willing to take on the asset and to find grant-funding that may pay for its continued conservation. This might include approaching the local authority, Historic England, the Heritage Lottery Fund, the Architectural Heritage Fund (who maintain a list of possible alternative sources of funding), charitable foundations, national and local amenity societies and preservation trusts.

Opportunities to enhance assets, their settings and local distinctiveness

52 Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.

Design and local distinctiveness

53 Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size

- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

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Seeing the History in the View



On 1st April 2015 the Historic Buildings and Monuments Commission for England changed its common name from English Heritage to Historic England. We are now re-branding all our documents.

Although this document refers to English Heritage, it is still the Commission's current advice and guidance and will in due course be re-branded as Historic England.

[Please see our website](#) for up to date contact information, and further advice.

We welcome feedback to help improve this document, which will be periodically revised. Please email comments to guidance@HistoricEngland.org.uk

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ENGLISH HERITAGE

Seeing the History in the View

REVISION NOTE

June 2012

On 27 March 2012, the Government published the National Planning Policy Framework (NPPF).

The NPPF supersedes Planning Policy Statement 5: Planning for the Historic Environment (PPS5) as Government Policy on the management of change to the Historic Environment in England.

Whilst some of the references in this document may now be out-of-date, English Heritage believes this document still contains useful advice and case studies.

We are in the process of revising this publication:

- **to reflect changes resulting from the NPPF and other Government initiatives**
- **to incorporate new information and advice based on recent case law and Inquiry decisions**

For further enquiries, please email policy@english-heritage.org.uk

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ENGLISH HERITAGE



SEEING THE HISTORY IN THE VIEW

A METHOD FOR ASSESSING HERITAGE
SIGNIFICANCE WITHIN VIEWS

May 2011

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RIGHT View of Greenwich over the Thames from Island Gardens, Old Royal Naval College in the foreground, the Queen's House in centre middleground and looking along the north-south axis to the General Wolfe statue in the background.
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Views play an important part in shaping our appreciation and understanding of England's historic environment, whether in towns and cities or in the countryside. Some of those views were deliberately designed to be seen as a unity – for example Greenwich Palace seen from the River Thames, or the many facets of Stowe Park in Buckinghamshire. Much more commonly, a significant view is a historical composite, the cumulative result of a long process of development. The existence of such views, often containing well-known landmarks and cherished landscapes, enriches our daily life, attracts visitors and helps our communities prosper.

This document explains how the heritage significance of views can be assessed in a systematic and consistent way however these views have come into being. The method draws on English Heritage's *Conservation Principles for the Sustainable Management of the Historic Environment* (2008), is compatible with the policies and principles set out in *Planning Policy Statement 5: Planning for the Historic Environment* (2010, 55) and, although originally developed for use in London, is intended to be applicable in all parts of the country and to both urban and rural environments. Phase A of this guidance (page 9) describes how to analyse the content and importance of a view whatever heritage assets may be visible within it, whether statutorily listed buildings, scheduled monuments, conservation areas, registered parks

and gardens, battlefields, UNESCO World Heritage Sites or assets of local interest. Phase B (page 15) then goes on to explain how to measure and document the likely impact of specific development proposals on historically important views.

Historically important views are among the many sensitive issues that local planning authorities have to consider, and this account of English Heritage's method of assessment is intended to help clarify this heritage aspect of the planning process, and promote national consistency. It should be especially useful to those commissioning and carrying out area-based studies as advocated by English Heritage and CABI in their joint *Guidance on Tall Buildings* (2007).

English Heritage will apply this method to its own decisions in relation to developments affecting views, and we believe that planning authorities and other interested parties will benefit by adopting the same approach.

Chris Smith

National Planning Director | English Heritage, May 2011

This document presents a method for understanding and assessing heritage 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 planning authority (perhaps in consultation with English Heritage) as part of the Environmental Impact Assessment (EIA) of a specific development proposal. The method can also be used to supplement understanding of views that are already recognised as being important and worth protecting, including:

- views identified as part of the plan-making process, such as those identified in the *London View Management Framework* (LVMF, Mayor of London 2010), Oxford City Council's *View Cones* (2005) and Westminster City Council's draft *Metropolitan Views* supplementary planning document (2007);
- views identified in character area appraisals or in management plans, for example of World Heritage Sites;
- important designed views from, to and within historic parks and gardens that have been identified as part of the evidence base for development plans, such as those noted during English Heritage's 2001 upgrading of the national Register of Historic Parks and Gardens;
- views that are identified when assessing sites as part of preparing development proposals.

One of the purposes of the qualitative approach proposed in this document is to help identify those views that best display the heritage significance of a feature or features. It therefore has the potential to help in the process of designating views of particular importance.

The method has been designed to provide a consistent and positive approach to managing change. This approach is in line with both the plan making and development management policies of *Planning Policy Statement 5: Planning for the Historic Environment [PPS5]* (CLG 2010) and *PPS5 Historic Environment Planning Practice Guide* (CLG, DCMS and EH 2010). It has been tested and refined through a number of worked examples.

From now on it will provide English Heritage, local planning authorities, developers and the wider public with a reliable method for assessing both the heritage significance of views and the likely impact of specific development proposals upon them. It does not impose or dictate a judgement as to whether the impact is acceptable or not. That judgement is the responsibility of the local planning authority. The approach should, however, help all parties to evaluate impact on a basis of common understanding and thus reduce the scope for differing judgements.

This method has wide applicability, but it is designed principally to assess specific views that have been recognised as being important. In accordance with HE6.1 of PPS5 applicants need *'to provide a description of significance of the heritage assets affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset.'* Where important views are likely to be affected by a development proposal, the applicant will need to demonstrate the impact on those views and existing methodologies, such as this one, provide a convenient means of achieving that. Even when some form of assessment is not specifically required by the local planning authority, an applicant may feel that using this methodology helpfully demonstrates the impact of their proposals.

THE NEED FOR, AND CONTEXT OF, GUIDANCE

The guidance set out in this document is most usefully and appropriately applied when complex issues involving views of important heritage assets need to be described and formally analysed. For instance, as part of a Local Development Framework document such as Supplementary Planning Guidance on important local views,

to help in determining complex planning cases often involving environmental impact assessment or as part of an understanding of base line views to be used when monitoring the condition of World Heritage Sites. The guidance may also be used when writing conservation area appraisals and conservation management plans.

The guidance has been developed in line with the principles set out in *Planning Policy Statement 5: Planning for the Historic Environment [PPS5]* (CLG 2010) and *PPS5 Historic Environment Planning Practice Guide* (CLG, DCMS and EH 2010). PPS5 policies protect the contribution heritage assets make to an area's character and sense of place (HE7.4) and the setting of heritage assets (HE8.1, HE9 and HE10). The setting is defined as the surroundings in which a heritage asset is experienced. Views are one way in which we experience heritage assets and an area's character and sense of place. So the assessment of the possible impact of proposed developments on views will directly assist in the application of PPS5 policies.

The guidance is designed to be used as part of the suite of other assessment and characterisation tools that are commonly applied in order to understand the significance of heritage assets in urban and rural areas and particularly when assessing the contribution made by setting to the significance of a heritage asset. The setting of any heritage asset is likely to include a variety of views of, across, or including that asset, and views of the surroundings from or through the asset. English Heritage guidance on the setting of heritage assets will be published in the summer of 2011. The potential application of many of these tools is summarised in *Understanding Place: an Introduction* (English Heritage 2010) which includes guidance on which characterisation tools to use in particular circumstances, taking into account the purpose, scale and scope of analysis needed.

RIGHT View of Liverpool's historic waterfront, showing the grade I Liver building and recent developments.
© English Heritage



English Heritage is frequently consulted by local planning authorities, developers and others on the impact of major developments on the historic environment, including impact on views that may contain important heritage assets. Assessing the impact of such developments has been particularly demanding in London and other major urban centres where proposals for tall buildings, potentially affecting the setting of many heritage assets, have required expert analysis of their visual impact over a wide area.

ENGLISH HERITAGE'S INVOLVEMENT

English Heritage's experience with development proposals has shown the need for guidance on how to apply a consistent and transparent approach to:

- identifying heritage significance within views;
- assessing how development proposals may impact upon heritage significance within views.

English Heritage has been involved in the assessment of views because of the requirement that it be notified of certain kinds of planning application, including those involving grade I and II* listed buildings. Within Greater London its role is slightly more extensive than in the rest of the country; for instance English Heritage is a statutory consultee for planning applications that may affect the geometrically defined views (Protected Vistas) in London that are subject to directions issued by the Secretary of State.⁰¹

01 Circular 01/01: Arrangements for handling heritage applications - notification and directions by the Secretary of State

RIGHT Panorama looking east over the City of Oxford from Raleigh Park.
© Land Use Consultants



In recent years English Heritage has been closely involved in advising on the protection of heritage significance within views in London, Oxford, Liverpool, Newcastle and Bristol. English Heritage has also commissioned research into the role and impact of tall buildings, which are often perceived to have the greatest potential impact on views. This research led to the development of *Guidance on Tall Buildings* (English Heritage and CABI 2007) which contains advice on how to plan for and assess the impact of tall buildings.

THE EMERGENCE OF QUALITATIVE VISUAL ASSESSMENT AS A TOOL IN LONDON

London, as a capital city, contains an exceptional concentration of nationally and internationally significant historic places. Its many iconic landmarks and views are also the subject of frequent and intense development pressure.

The London Plan, the Spatial Development Strategy for Greater London (Mayor of London 2004), introduced the concept of view management plans to manage London's designated views (Policy 4B.16). In 2007 the *London View Management Framework (LVMF) supplementary planning guidance* (Mayor of London 2007) introduced the concept of qualitative visual assessment (QVA) as a means of assessing how a development proposal may affect a designated view listed in *The London Plan*.

The Revised Supplementary Planning Guidance LVMF (July 2010) sets out in greater detail the policies in the *Consultation Draft Replacement London Plan*, Policies 7.11 (London View Management Framework) and policy 7.12 (Implementing the London View Management Framework).

DEVELOPING THE METHOD

English Heritage recognises that the approach pioneered by the LVMF must be applicable outside London, as well as inside, and to rural as well as to urban landscapes. The method set out in the present document has therefore been developed to provide a consistent basis for advising planning authorities across England. Although dependent on qualitative analysis, it provides a consistent baseline for assessing the impact of development on heritage significance within views. As a result, it aims to reduce the scope for disputes about the nature and scale of those impacts.

The value of such an approach has also been recognised by UNESCO, which is concerned to ensure that the 'Outstanding Universal Value' (OUV) of World Heritage Sites (WHS) is not adversely affected by pressure for continuing development, particularly in urban locations.

The method presented in this document is specifically designed to help describe and analyse heritage significance within a view. A view can also contain other significant cultural elements, for example non-historic landmarks.

ASSESSING HERITAGE SIGNIFICANCE IN VIEWS

The qualitative assessment of heritage significance within views is divided into two phases:

Phase A baseline analysis: defines and analyses heritage significance within a view.

Phase B assessment: assesses the potential impact of a specific development proposal on heritage significance within a view, as analysed in Phase A.

Phase A: Baseline Analysis

- Describes the baseline against which change can be monitored;
- Undertaken by English Heritage, local planning authorities and others as required.

Phase B: Assessment

- Assesses the potential impact of a specific development proposal on heritage significance within a view;
- Undertaken by the developer as part of the Cultural Heritage chapter of the EIA (and, in London, as part of a wider qualitative assessment of views in the LVMF);
- May be undertaken by others with an interest in the view e.g. English Heritage.

Specific
Development
Proposal

Figure 1

Phase A Baseline Analysis



ESTABLISHING THE BASELINE SIGNIFICANCE OF HERITAGE IN VIEWS

This method for understanding heritage significance within views has been developed to:

- highlight the architectural, archaeological, artistic and historic interest in and context of views, and to promote appreciation and understanding of heritage significance within those views;
- enable English Heritage to offer clear, consistent advice to local planning authorities on impacts on heritage significance within views;
- assist local planning authorities in the development of spatial planning policy in relation to the protection and enhancement of views;
- establish a baseline against which to judge the impact of proposals upon heritage significance.

The approach to Phase A analysis reflects English Heritage's broader conservation philosophy – that understanding the heritage significance of a place or asset is a prerequisite to managing that place or asset in ways that preserve and enhance its significance. The method thus:

- provides a succinct and replicable analysis of heritage significance within views;
- is compatible with PPS5 Policy HE2 (Evidence base for plan-making) and HE6.1 (Information requirements for consents affecting heritage assets);

- is compatible with English Heritage's Conservation Principles including the advice that 'decisions about change in the historic environment demand the application of expertise, experience and judgement in a consistent, transparent process...' (2008, para 5.1);
- is compatible with the Circular on the Protection of World Heritage Sites (DCLG and DCMS July 2009) and accompanying guidance and with UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention (2008), particularly the definitions of OUV, integrity and authenticity.

WHO SHOULD UNDERTAKE THE PHASE A ANALYSIS?

Phase A analysis may be commissioned or undertaken:

- by a strategic or local planning authority, as part of its plan-making process;
- by English Heritage in its own work to promote appreciation and understanding of heritage significance within views;
- by a developer in order to inform development proposals or to construct a baseline against which impacts of a specific development proposal may be assessed by community and other groups.

In all cases the analysis should be undertaken by someone with appropriate experience and qualifications who understands the historic environment.

The process of Phase A analysis is summarised in Figure 2 and explained in more detail below. Readers may also find it helpful to refer to the fully illustrated practical example of the application of the method presented in Appendix D.

Plans and photographs should be used to illustrate the analysis (see Appendix C for technical details). These should include:

- a map showing the Viewing Place and Assessment Point(s) based on the 1:1250 topography layer of the Ordnance Survey MasterMap™ where available;
- photograph(s) taken from the Assessment Point(s);
- photograph(s) taken from the Assessment Point(s) annotated or coloured to show the location of key heritage assets which may include World Heritage Sites, listed buildings (grades I, II* and II), scheduled monuments, registered parks and gardens, registered battlefields, conservation areas or other heritage assets;
- photograph(s), if relevant, to show the kinetic nature of the view.

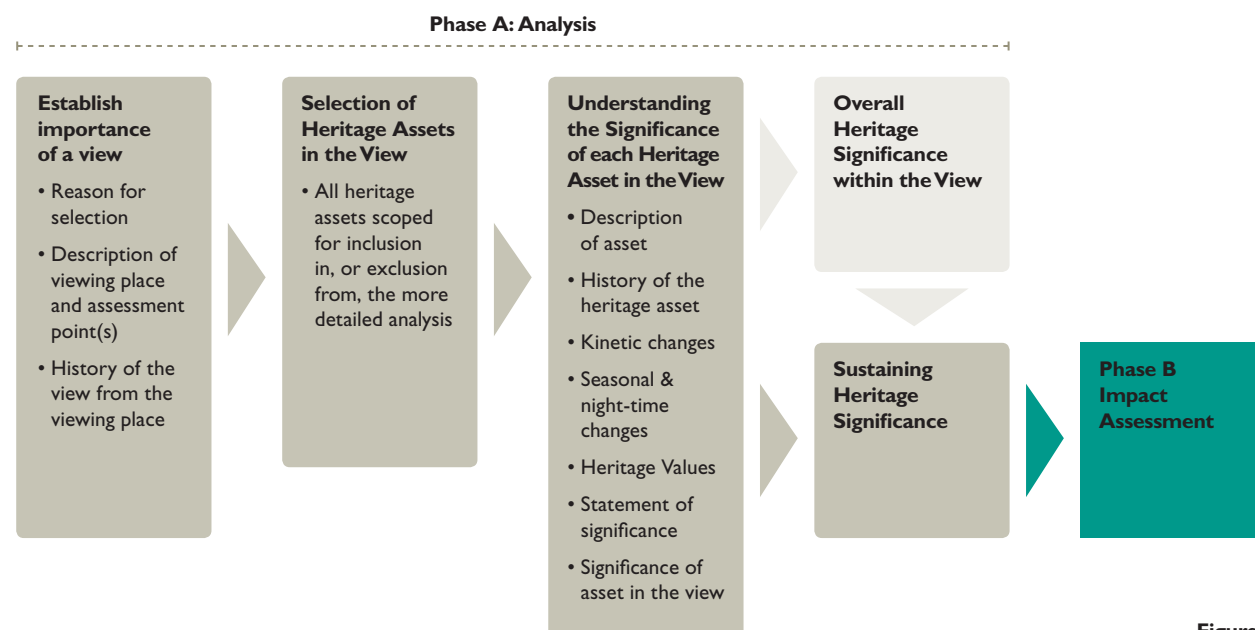


Figure 2

Site visits should be supported by information derived from authoritative published and archival sources, which may be referred to in Historic Environment Records (HERs). Amongst the most important of these are World Heritage Site nomination documents and management plans; conservation area statements and appraisals; listed building descriptions; scheduled monument, registered historic park and garden and battlefield citations; Royal Commission on the Historical Monuments of England (RCHME) inventories and studies, and Pevsner's architectural guides to the buildings of England (Yale University Press). The owners of historic buildings, relevant experts and members of the local community can also be valuable sources of information, especially about the less well-documented evidential and communal values of a place.

STEP 1**ESTABLISHING REASONS FOR IDENTIFYING A PARTICULAR VIEW AS IMPORTANT**

This opening section should explain the reason for selecting the view and 'Viewing Place' and provide a summary of their history. It should also include a description of the location and extent of the Viewing Place and the location of the 'Assessment Point' or points (see Appendix B for definitions of Viewing Place and Assessment Point).

The history of the Viewing Place and view should describe historical relationships between heritage assets to establish whether these contribute to the overall historic significance within the view. This section could usefully be illustrated by historic images.

STEP 2**IDENTIFYING WHICH HERITAGE ASSETS IN A VIEW MERIT CONSIDERATION**

This section should identify all heritage assets within the view and establish which should be included in the assessment (for definition of heritage assets see Glossary at Appendix A).

Selection of heritage assets for inclusion depends on:

- their designation or importance in a local context;
- the degree to which their heritage significance can be appreciated from the Viewing Place;
- whether this may be the best (or only) place to view the historic significance of the heritage asset;
- whether their significance is enhanced or diminished as a result of being seen in combination with other heritage assets in the view.

This selection or 'scoping' of heritage assets should be supported by sound evidence and reasoned judgement.

Whether a conservation area, as such, is included in the assessment of a view is a matter of judgement, depending on how well its overall character, as distinct from its individual listed buildings, can be appreciated from the Viewing Point.

In the course of the scoping exercise the assessor may find it useful to rank the different heritage assets in terms of their relative importance in the view.

RIGHT Changing visual relationships of heritage assets as experienced when moving through the viewing area.
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STEP 3

ASSESSING THE SIGNIFICANCE OF INDIVIDUAL HERITAGE ASSETS

A succinct description should be provided of each heritage asset and its place and visibility in the view.

A brief factual summary of the history and nature of the heritage asset within the view should then be provided in line with the advice in English Heritage *Conservation Principles*, paragraph 3.3⁰².

CHANGES EXPERIENCED WHEN MOVING THROUGH THE VIEWING PLACE

Views are often kinetic (i.e. the observer is moving) and so, if necessary, there should be separate consideration and explanation of how the visibility and appearance of the heritage asset may change as the observer moves around the Viewing Place. This may include a description of the asset's visual relationship to other features in the view. Some views will have a more extensive Viewing Place than others.

02 CP 3.3 In order to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:

- who values the place, and why they do so
- how those values relate to its fabric
- their relative importance
- whether associated objects contribute to them
- the contribution made by the setting and context of the place
- how the place compares with others sharing similar values.

SEASONAL/NIGHT-TIME VARIATIONS

Seasonal and diurnal variations in the view should also be considered. Does summer foliage hide an asset that is visible in winter? Does floodlighting at night emphasis some aspects of an asset and leave others in the dark?

HERITAGE VALUES OF A HERITAGE ASSET

Heritage assets have a value beyond mere utility. The 'family' of heritage values identified in *Conservation Principles* provide a way to analyse the significance of heritage assets. These heritage values can help to decide the most efficient and effective way of managing the heritage assets so as to sustain their overall value to society. These values can be used to explain what it is that gives a place its special value and they may also be usefully applied to the heritage assets within a view.

Views of features within World Heritage Sites may demonstrate the 'Outstanding Universal Value' for which they have been inscribed by UNESCO's World Heritage Committee – a 'cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity' (UNESCO 2008, para 49).

SIGNIFICANCE OF THE HERITAGE ASSET

Having identified the individual heritage values of an asset it is then necessary to understand the significance of the asset as a whole even though, as is likely, not all of it may be visible.

SIGNIFICANCE OF A HERITAGE ASSET IN THE VIEW

State which aspects of an asset's heritage significance can be appreciated *in the view*. For example, in the case of Tower Bridge as viewed from City Hall (see Appendix D) some aspects of its heritage significance (such as the fusion of innovative engineering and architectural form) may be appreciated in the view of the bridge while other aspects (such as its internal mechanism, which originally was hydraulic) cannot be seen.

STEP 4

ASSESSING THE OVERALL HERITAGE SIGNIFICANCE IN A VIEW

How do all the heritage assets identified contribute to the overall heritage significance in the view? Set out the relative contribution of each identified heritage asset to the overall value of the view, highlighting those assets that contribute most to the overall heritage significance.

Consider how individual assets are interrelated in the view, noting any additional values that arise from seeing the assets as a group. Where the significance of the whole is greater than the sum of its parts, this should be explained; for example, composite or fortuitous views which are the cumulative result of a long history of development, particularly in towns and cities may, through the gradual accrual of aesthetic and communal values, become historically significant.

Sometimes a view has been designed to be seen as a whole although its components may have been built at different times. Heritage assets (sometimes of different periods) may have been deliberately linked by the creation of views which were designed to have a particular effect, often focusing on a particular built or topographic landscape feature. In these cases the view is a fundamental aspect of the design of the asset or assets, unlike assets in composite or fortuitous views.

Finally, identify any situations in which the values of one heritage asset in the view may conflict with, or contradict, those of another:

STEP 5

HOW CAN HERITAGE SIGNIFICANCE BE SUSTAINED?

The purpose of this section of the assessment is to explain in practical terms how the appreciation of the heritage significance within the view can be sustained. English Heritage and/ or the local planning authority will draw on this information to inform their response to any proposals for change within views. Individual heritage asset sustainability statements should be set out in order of priority, starting with the most important.

Phase B Assessment of Impact



ASSESSING THE IMPACT OF DEVELOPMENT PROPOSALS ON HERITAGE IN A VIEW

The second part of this guidance document describes a method for assessing the potential impact of development proposals on heritage significance within views. More specifically, it has been developed to provide:

- consistency in the way such proposals are assessed, including assessing how a development may affect understanding of a heritage asset or the ability to appreciate the 'outstanding universal value' (OUV) of a World Heritage Site (WHS)
- clarity in assessment of impact on heritage significance within views, linking it to Environmental Impact Assessment (EIA).

The method takes account of *Guidance on Tall Buildings* (English Heritage and CABE 2007), including the need to examine cumulative impacts and to assess effects on heritage assets such as WHS.

Phase B assessment focuses on the impact of specific development proposals on what is of *heritage significance* within a view. It is important to recognise that a view may also have a wider cultural significance, and the impact on this of proposed change needs to be assessed in parallel. One such tool for assessing impacts on wider cultural significance is through the 'qualitative visual assessment' methodology advocated in the 2007 LVMF (replaced in the Revised SPG 2010 by more general guidance on the assessment process including reference to what is culturally important in the view and revised management guidance for the three main view types)⁰³.

In terms of the historic environment, it is assumed that a developer would also make use of advice and information of wider scope, such as character appraisals where they exist, to assess the overall impact of a proposed development on the historic environment.

LINKS TO EIA

Environmental Impact Assessment (EIA) is a procedure to ensure that the environmental effects of development are fully understood and taken into account in the decision-making process. EIA is a European Community (EC) requirement under Directive 85/337/EEC⁰⁴. Projects that fall within the scope of the Directive include 'Schedule 1 projects' (e.g. oil refineries, power stations, chemical installations and waste disposal installations for which EIA is required in every case) and 'Schedule 2' projects (for which EIA is required only if the project is judged likely to give rise to significant environmental effects). Local planning authorities will determine whether an EIA is necessary. Developments are classified as 'Schedule 2' where they meet or exceed certain threshold criteria – including physical scale or complexity of the proposal, visual intrusion and impact on heritage – or if the proposed development is in, or partly in, a 'sensitive area' ('sensitive areas' include World Heritage Sites and scheduled monuments). In addition, Circular 02/99 – the Guidance on the EIA Regulations states that:

...in certain cases other statutory and non-statutory designations which are not included in the definition of 'sensitive areas', but which are nonetheless environmentally sensitive, may also be relevant in determining whether EIA is required (para 39).

The information generated from an assessment of the impact of a proposed development on views should be incorporated into a broader heritage impact assessment, if required as part of an EIA.

⁰³ LVMF 2010, 7 ff

⁰⁴ The Directive has been amended three times in 1997, 2003 and 2009, and given legal effect through the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999 (SI No 293).

WHO SHOULD UNDERTAKE THE PHASE B ASSESSMENT?

Responsibility for undertaking a Phase B assessment of the impact of a proposed development on heritage significance within a view lies with the developer (PPS5 HE6.2), who should consult at an early stage with the local planning authority and English Heritage to make sure that the scope of the assessment is agreed. The method also sets out clearly how English Heritage will assess the impact a specific development would have on heritage significance within a view.

In London, the Phase B assessment may also provide one of the strands that feeds into the management guidelines advocated in the London View Management Framework supplementary planning guidance.

PROCESS OF PHASE B ASSESSMENT

The process of the Phase B assessment can be summarised as shown in Figure 3 below.

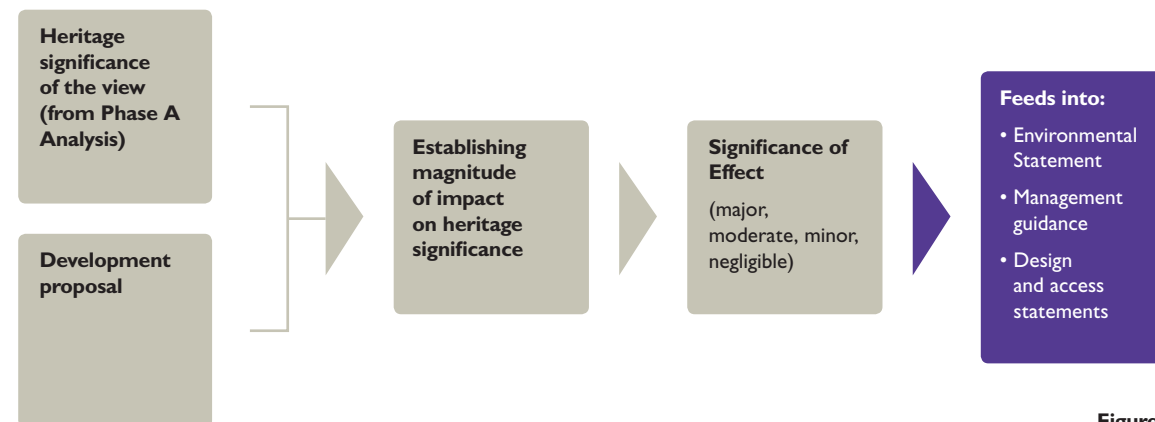


Figure 3

RESOURCES AND RECEPTORS: WHAT NEEDS TO BE ASSESSED?

EIA requires the assessor to identify the resource or receptor likely to be affected by a proposed development. In this case there are two types of heritage resource or receptor:

- the individual heritage assets identified within the view (and their heritage significance as defined in the Phase A analysis) (see Table 1, page 19)
- the view as a whole (and its heritage significance identified in the Phase A analysis) (see Table 2, page 20).

APPROACH TO ASSESSMENT

Methods for determining the significance of an effect as part of an EIA vary. Currently, there is no formal guidance on how to assess effects on cultural heritage within an EIA. However, in landscape and visual impact assessment (LVIA) the Landscape Institute's guidance (*Landscape Institute, 2002, 92*) suggests that the two principal criteria determining significance are scale or magnitude of impact and the environmental sensitivity of the location or receptor. These criteria are combined to come to a judgement about significance of effect. This involves making a judgement on the relative value or sensitivity of different resources.

ADVANTAGES AND DISADVANTAGES OF USING MATRICES

Some practitioners in landscape and visual impact assessment use matrices while others prefer to use a well argued narrative account to arrive at an overall view of significance. The advantage of using a matrix is that the process is transparent. The disadvantage is that a matrix can be restrictive and the relationship between the two axes is not always linear (*Landscape Institute 1995 and 2002*). Above all it is important to remember that any method is a tool for assessment and ultimately assessment of the level of effect will be down to professional judgement.

For this assessment it is therefore necessary to identify the value and importance of the resource or receptor and the magnitude of impact.

TABLE I
VALUE/IMPORTANCE OF
INDIVIDUAL HERITAGE
ASSETS IDENTIFIED
WITHIN THE VIEW

VALUE/ IMPORTANCE	DEFINITION
HIGH	The asset will normally be a World Heritage Site, grade I or II* listed building, scheduled monument, grade I or II* historic park and garden or historic battlefield which is a central focus of the view and whose significance is well represented in the view. The Viewing Place (and/or Assessment Point) is a good place to view the asset or the only place from which to view that particular asset.
MEDIUM	The asset will normally be a grade II listed building, grade II historic park and garden, conservation area, locally listed building or other locally identified heritage resource which is a central focus of the view and whose significance is well represented in the view. The Viewing Place (and/or Assessment Point) is a good place to view the asset and may be the only place from which to view that particular asset. The asset may also be a World Heritage Site, grade I or II* listed building, scheduled monument, grade I or II* historic park and garden or historic battlefield which does not form a main focus of the view but whose significance is still well represented in the view. In this case the Viewing Place (and/or Assessment Point) may be a good, but not the best or only place to view the heritage asset.
LOW	The asset may be a grade II listed building, grade II historic park and garden, conservation area, locally listed building or other locally identified heritage resource which does not form a main focus of the view but whose significance is still well represented in the view. In this case the Viewing Place (and/or Assessment Point) may not be the best or only place to view the heritage asset.

STEP 6

IDENTIFYING THE IMPORTANCE OF THE ASSETS AND THE VIEW

Two types of resource or receptor are identified (see page 18):

- individual heritage assets identified within the view;
- the view as a whole (i.e. the sum of the heritage assets visible within it).

The value of individual heritage assets in the view may be determined on the basis of their designated status, the degree to which their heritage significance can be appreciated in the view, their contribution to the view and whether this is the best (or only place) to view the asset.

TABLE 2
VALUE/IMPORTANCE OF
THE VIEW AS A WHOLE

VALUE/ IMPORTANCE	DEFINITION
High	The view is likely to be a nationally or regionally important view (e.g. views in the LVMF; a view identified in a World Heritage Site management plan or designed views within grade I or II* historic parks or gardens) and/or contain heritage assets such as World Heritage Sites, grade I or II* listed buildings, scheduled monuments, grade I or II* historic parks or gardens or historic battlefields whose heritage significance is well represented in the view and which benefit from being seen in combination with each other.
Medium	<p>The view is likely to be of importance at the county, borough or district level (e.g. Metropolitan Views defined by London boroughs or designed views within grade II historic parks or gardens) and/or contain heritage assets such as grade II listed buildings, grade II historic parks or gardens, conservation areas, locally listed buildings or other locally identified heritage resources whose heritage significance is well represented in the view and which benefit from being seen in combination with each other.</p> <p>It may also be a view that contains heritage assets such as World Heritage Sites, grade I or II* listed buildings, scheduled monuments, grade I or II* historic parks or gardens, or historic battlefields whose heritage significance is clearly readable, but not best represented, in this particular view.</p>
Low	The view is likely to be a locally valued view and contain heritage assets such as grade II listed buildings, grade II historic parks or gardens, conservation areas, locally listed buildings or other locally identified heritage resources whose heritage significance is clearly readable, but not best represented, in this particular view.

The value of the view as a whole may be determined through its designated status, the overall heritage significance in the view, and the extent to which the view exhibits additional significance as a result of a number of heritage assets being seen in combination with each other. It may also encompass designed views, such as Lancelot 'Capability' Brown's views of Blenheim Palace created across the lake (see photograph on page 21). The value and importance of a view may be determined as shown in Table 2.

RIGHT View of Blenheim Palace beyond the lake created by Capability Brown. Vanbrugh's Grand Bridge (1710) to the left.
© Visit Britain



TABLE 3
CRITERIA FOR DETERMINING
MAGNITUDE OF IMPACT ON
HERITAGE SIGNIFICANCE
WITHIN A VIEW

MAGNITUDE OF IMPACT	DEFINITION
High beneficial	The development considerably enhances the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Medium beneficial	The development enhances to a clearly discernable extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Low beneficial	The development enhances to a minor extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Imperceptible/None	The development does not affect the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Low adverse	The development erodes to a minor extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Medium adverse	The development erodes to a clearly discernable extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
High adverse	The development severely erodes the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.

STEP 7

ASSESSING THE MAGNITUDE OF THE IMPACT ON INDIVIDUAL HERITAGE ASSETS

Assessment of the magnitude of impact should as far as possible be objective, reasoned and quantifiable. The assessor should consider the extent to which heritage significance within a view, identified in the Phase A analysis, may be changed or affected by the proposed development by reason of the latter's location or design.

It is not the purpose of the assessment to evaluate the design quality of a proposed development. However, the extent to which specific design parameters influence the impact of the development upon heritage significance within a view is relevant. Aspects of design such as scale, mass, silhouette, and reflectivity may be particularly relevant to impact on heritage significance within a view.

Impacts may be beneficial or adverse. If the proposed changes will enhance heritage values or the ability to appreciate them, as expressed in the Phase A assessment, then the impact on heritage significance within the view will be deemed to be beneficial; however, if they fail to sustain heritage values or impair their appreciation then the impact will be deemed to be adverse. For example, a development proposal that blocks, dominates, or detracts from a heritage asset by virtue of its scale, position in a view, or design is likely to result in an adverse impact both on the asset itself and the way in which it can contribute to the heritage significance within the view. On the other hand, the removal of an existing building that interferes with a heritage asset is likely to result in a beneficial impact.

For this assessment, level of impact in terms of scale, position in a view, or design should be recorded on a seven-point scale as shown in Table 3.

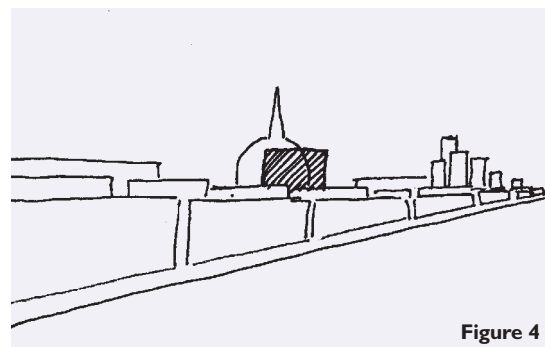


Figure 4

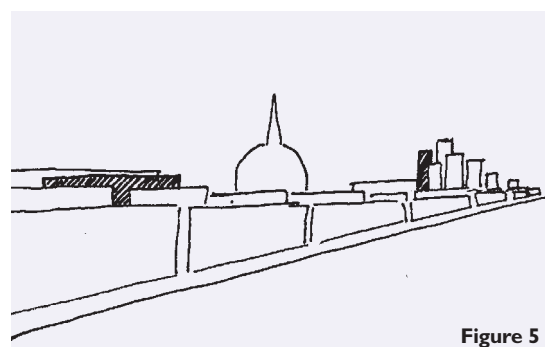


Figure 5

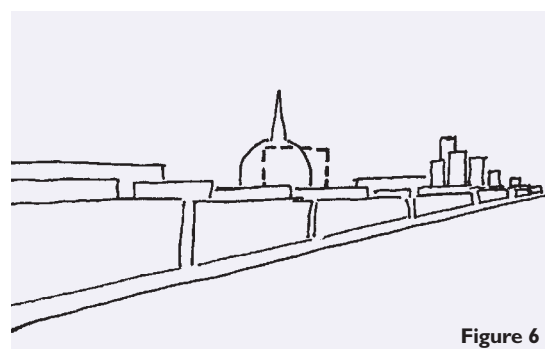


Figure 6

Figure 4 Proposed development may adversely affect the understanding and appreciation of a heritage asset in the view.

Figure 5 Proposed development may have a neutral effect on the understanding and appreciation of heritage assets in the view.

Figure 6 removal or remodelling of an existing feature may positively enhance the understanding and appreciation of a heritage asset in the view.

Images © Land Use Consultants

It is important to consider how the proposed development would relate to heritage assets as the observer moves through the Viewing Place. In London, although the LVMF identifies specific assessment points, it also allows that in some cases 'it is important to consider a view as it would be experienced by a person moving through the Viewing Location'. The kinetic view is represented by a red line drawn between two or more Assessment Points. 'In these cases it will be necessary to test both Assessment Points and one or more points on the red line. The additional points should be identified in consultation with the local planning authority' (Mayor of London 2010, para 35).

Where views are affected by seasonal differences impacts should be assessed both in summer and winter to take account of differences in lighting and leaf loss from trees. It is important to assess the impact of a proposed development on the view at night as well as during the day. This should consider how night-time lighting associated with the proposed development will affect the heritage values set out in the Phase A analysis. The assessment should use the same criteria as above.

TABLE 4
THE MAGNITUDE OF THE
CUMULATIVE IMPACT OF
PROPOSALS ON HERITAGE

MAGNITUDE OF CUMULATIVE IMPACT	DEFINITION
High beneficial	The development, in conjunction with other changes, considerably enhances the heritage values of the heritage assets in the view, or the ability to appreciate those values or the view as a whole.
Medium beneficial	The development, in conjunction with other changes, enhances to a clearly discernable extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Low beneficial	The development, in conjunction with other changes, enhances to a minor extent the heritage values of the heritage assets in the view, or the view as a whole, or the ability to appreciate those values.
Imperceptible/None	The development, in conjunction with other changes, does not change the heritage values of the heritage assets in the view, or the ability to appreciate those values or the view as a whole.
Low adverse	The development, in conjunction with other changes, erodes to a minor extent the heritage values of the heritage assets in the view, or the ability to appreciate those values or the view as a whole.
Medium adverse	The development, in conjunction with other changes, erodes to a clearly discernable extent the heritage values of the heritage assets in the view, or the ability to appreciate those values or the view as a whole.
High adverse	The development, in conjunction with other changes, substantially affects the heritage values of the heritage assets in the view, or the ability to appreciate those values or the view as a whole.

STEP 8

ASSESSING THE MAGNITUDE OF THE CUMULATIVE IMPACT OF PROPOSALS ON HERITAGE

Cumulative assessment is required under the EU Directive on EIA. Its purpose is to identify impacts that are the result of introducing the development into the view in combination with other existing and proposed developments. The combined impact may not simply be the sum of the impacts of individual developments; it may be more, or less.

The magnitude of cumulative impact (i.e. the proposed development in conjunction with other changes) in terms of scale, position in a view or design should be described as high, medium, low, or imperceptible/none, according to Table 4.

Schemes for which planning consent has already been granted may not necessarily go ahead, but this does not obviate the need to consider the impact of the development proposal in combination with these schemes.

STEP 9**DETERMINING THE OVERALL IMPACT**

Part of the EIA process is to attach some measure of significance to impact predictions (DETR 1995). In the context of EIA, 'significance' varies with the type of project and the topic under assessment. No formal guidance exists for the assessment of significance of effects on heritage assets or heritage significance within views. However, the severity of the effect on heritage assets and heritage significance within views may depend on both the magnitude of impact and the value and importance of the resource as follows:

	WITH HIGH VALUE	WITH MEDIUM VALUE	WITH LOW VALUE
With high magnitude of impact	Major effect	Major effect	Moderate effect
With medium magnitude of impact	Major effect	Moderate effect	Minor effect
With low magnitude of impact	Moderate effect	Minor effect	Negligible effect
Negligible/neutral impact	Negligible effect	Negligible effect	Negligible effect

TABLE 5
MAGNITUDE OF IMPACT
AGAINST VALUE

IDENTIFYING ACCEPTABILITY

Ratings of significance are independent of 'acceptability' which is a judgement above and beyond that of significance. Acceptability is about the overall balance of benefits and harm from the proposals as viewed or weighted by national policy and development plan policies.

STEP 10**IDENTIFYING WAYS OF MITIGATING THE IMPACT OF THE DEVELOPMENT**

Impact assessment and design development should be part of an iterative process – it will be important for a developer to show how the results of an assessment have been considered in the design process to avoid harm to heritage significance within the view. Aspects of design such as scale, mass, silhouette and reflectivity may be particularly relevant to mitigation of impacts on the historic environment. These are matters which would be included in a Design and Access Statement.

GRAPHICS ACCOMPANYING PHASE B ASSESSMENT

The Phase B assessment should be accompanied by 'accurate visual representations' (AVRs). These AVRs should show the proposed development in the existing view (i.e. without any other consented schemes) by day, and by night if considered appropriate. AVRs showing the proposal alongside other consented schemes should also be prepared as part of the cumulative assessment. One example of how these can be prepared is given in Appendix D of the *London View Management Framework* (Mayor of London 2010).

Viewpoints, from which AVRs will be prepared to show the impact of a development proposal on heritage significance within the view, should be agreed with the local planning authority and with English Heritage.

In London, the LVMF requires that, during the assessment and consultation phase for a development which is likely to affect a designated view, the number and location of Assessment Points needed will be refined in consultation with the local planning authority and statutory consultees. It also recognises that it may be beneficial to test the kinetic effect of a development across an entire Viewing Area using a moving image or a series of AVRs.

In all cases it should be noted that photographs are illustrations of a view at a given point in time and that they cannot capture everything that can be seen with the naked eye. The AVRs are no substitute for visiting the Viewing Place and considering the impact of a proposal with the naked eye.

ACCURATE VISUAL REPRESENTATION (AVR)

A still image, or animated sequence of images, intended to convey reliable visual information about a proposed development to assist the process of visual assessment⁰⁵.

ASSESSMENT POINT

An Assessment Point is considered to be the optimum viewing point and is the reference point for the assessment of a view. It is the starting point for determining how a designated view will be assessed. However, the LVMF acknowledges that it may not always provide the most relevant point from which to assess a specific development proposals and that the number of assessment points should be refined through the assessment and consultation process (with the LPAs and statutory authorities).

AUTHENTICITY

Those characteristics that most truthfully reflect and embody the cultural heritage values of a place (English Heritage 2008, 71).

BACKDROP

The backdrop is the immediate background to a strategic landmark or focus of the view. It is distinct from a background area that extends away from the foreground or middle ground into the distance.

BASELINE

A minimum or starting point used for comparisons.

BULKY BUILDINGS

Buildings that are exceptional in bulk, floor area or frontage compared to their neighbours.

CULTURAL HERITAGE

Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others (English Heritage 2008, 71).

DESIGNED VIEW

A view that is the product of a deliberate design, usually intended to create a particular effect, illustrate a particular aspect of a landscape or focus on a particular feature or

features in a landscape. Such a landscape and its features do not themselves all have to be designed, but they may be.

DOMINANT

Having a commanding or imposing effect.

DYNAMIC VISUAL IMPACT STUDY (DVIS)

A study designed to assess the potential visual impact of a development proposal on a world heritage site. It is dynamic in the sense that the study will take account of potential changes: diurnally, seasonally, over time, kinetically and as a result of cumulative impact. It is envisaged that a DVIS should form part of the planning application (or incorporated into other application documents such as an Environmental Impact Assessment) for proposals that might impact on views into, within or out of a World Heritage Site identified as important by a Planning Authority.

ENVIRONMENTAL EFFECT

The consequence of a change on a resource or receptor.

ENVIRONMENTAL IMPACT

The process by which a change is brought about in the existing environment as a result of development activities.

ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

A process by which a developer collects information about the environmental effects of a project for assembly in an environmental statement.

ENVIRONMENTAL STATEMENT (ES)

A document which sets out the developer's assessment of the likely effects of a project on the environment and which is submitted in conjunction with an application for planning permission.

⁰⁵ Text in italics is taken directly from the Revised SPG London View Management Framework (Mayor of London 2010).

GEOMETRIC PROTECTION

Where the visibility of a Strategically Important Landmark has been identified as a critical component of a designated view in the LVMF, a Protected Vista has been defined to permit the management of this aspect of the view by precise geometric constraint.

HERITAGE

All inherited resources which people value for reasons beyond mere utility (English Heritage 2008, 71).

HERITAGE ASSET

A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated assets (as defined in PPS5⁰⁶) and assets identified by the local planning authority during the process of decision making or through the plan-making process (including local listing).

HERITAGE SIGNIFICANCE

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.⁰⁷

HERITAGE VALUES

The reasons for which people may value a place. Examples may include 'its distinctive architecture or landscape, the story it can tell about its past, its connection with notable people or events, its landform, flora, fauna, because they find it beautiful or inspiring, or for its role as a focus of a community' (English Heritage 2008, 27). Comprehensive thought about values may be prompted by using the following headings – evidential, historical, aesthetic and communal – which move in general terms from more objective to more subjective. These terms are defined in English Heritage's *Conservation Principles* (2008, 72) as follows:

Evidential Value – deriving from the potential of a place to yield primary evidence about past human activity.

Historical Value – deriving from the ways in which past people, events and aspects of life can be connected through a place to the present.

Aesthetic Value – deriving from the ways in which people draw sensory and intellectual stimulation from a place.

Communal Value – deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

HISTORIC ENVIRONMENT

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Those elements of the historic environment that hold significance are called heritage assets.

HISTORIC URBAN LANDSCAPE

Ensembles of any groups of buildings, structures and open spaces in their natural and ecological context, comprising distinctive land uses and patterns, spatial organisation, visual relationships, topography and soils, vegetation, infrastructure and architecture, and representing current and past social expressions and developments that are place-based.

⁰⁶ Designated assets – A World Heritage Site, scheduled monument, listed building, protected wreck site, registered park and garden, registered battlefield or conservation area (PPS5, Annex 2)

IMPACT ASSESSMENT

The process of assessing how a proposal might affect heritage significance within a view.

INTEGRITY

Integrity is a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes (UNESCO 2008).

KINETIC

Relating to, caused by, or producing motion. The kinetic, or dynamic, nature of a view refers to the way in which it changes as the viewer moves through a Viewing Place.

LANDMARK

An object or feature of a landscape or town that is easily seen from a distance (*Oxford English Dictionary*). A landmark may also be defined as a building or site having great import or significance. The LVMF identifies 'strategically important landmarks' and 'other landmarks'. Other landmarks are considered to be those features that have visual or cultural prominence in the view.

LONDON VIEW MANAGEMENT FRAMEWORK (LVMF)

The London View Management Framework is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.

www.london.gov.uk/priorities/planning/vision/supplementary-planning-guidance/view-management

MITIGATION

Any process, activity or thing designed to avoid, reduce or remedy adverse environmental impacts likely to be caused by a development project (DETR 1995)

OUTSTANDING UNIVERSAL VALUE (OUV)

Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity (UNESCO 2008).

PROMINENT

Important, projecting or particularly noticeable.

PROTECTED VISTA

A geometrically defined corridor designed to control the effect of development – in the foreground, middle ground and background of a view of a SIL.

TALL BUILDING

A building which is substantially taller than its neighbours and/or which significantly changes the skyline (after CABE/EH guidance 2007).

SCOPE

The extent of the area or subject matter that something deals with or to which it is relevant.

SCOPING

An exercise to determine the extent of the area or subject matter that is relevant to the study.

SETTING

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.

Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (CLG 2010).

SIGNIFICANCE (IN THE CONTEXT OF EIA)

For the purposes of EIA a significant impact can be defined as an impact which, in the judgement of the assessor, should be taken into account in the decision-making process.

STRATEGICALLY IMPORTANT LANDMARK (SIL)

*A prominent building or structure in the townscape, which has visual prominence, provides a geographical or cultural orientation point and is aesthetically attractive through visibility from a wider area or through contrast with objects or buildings close by*⁰⁸. Three SILs are defined in the LVMF: the Palace of Westminster, the Tower of London, and St Paul's Cathedral.

URBAN GRAIN

The pattern and arrangement of street blocks and plots. The urban grain is usually formed by the historical development of roads and plots of land.

VALUE

An aspect of worth or importance, here attached by people to qualities of places (English Heritage 2008, 72).

VIEW

A sight or prospect from a particular position, typically an appealing one (*Oxford English Dictionary*); that which is seen; esp., a scene or prospect, as of a landscape; a picture, sketch, or photograph of a scene.

VISUAL MANAGEMENT GUIDANCE

Management Plans have been prepared for each of the designated views contained in the LVMF (Mayor of London 2010). The management plans contain information that forms the basis of the preparation of townscape and visual assessments required for proposals.

VIEWCONE

A graphic representation of the width of a view.

VIEWING LOCATION

The general part of a Viewing Place from which a particular view may best be appreciated. There may be one or more Viewing Locations in each Viewing Place. (This concept does not appear in the LVMF 2007 and is not used in this English Heritage guidance).

VIEWING PLACE

A public space from which Designated Views are defined by the London Plan. Within each Viewing Place, this SPG defines one or more Viewing Locations (As with Viewing Point below this concept has been revised since the first publication of the LVMF).

A viewing place should be publically accessible and well used. In many cases, especially river prospects, the view of a Strategically Important Landmark is unlikely to be from a single standalone point. The view will, in reality, be perceived from moving through and around a whole space – the Viewing Place.

VIEWING POINT

The Viewing Point is a specific location that is in a public space and is within reasonable proximity of an Assessment Point for a designated view. The Viewing Point will have specific relevance to the assessment of a development proposal on a designated view⁰⁹ (this concept has been removed from the Revised LVMF, July 2010, but continues in use in this English Heritage guidance).

Appendix B Defining Viewing Place, Assessment Points And Viewing Points

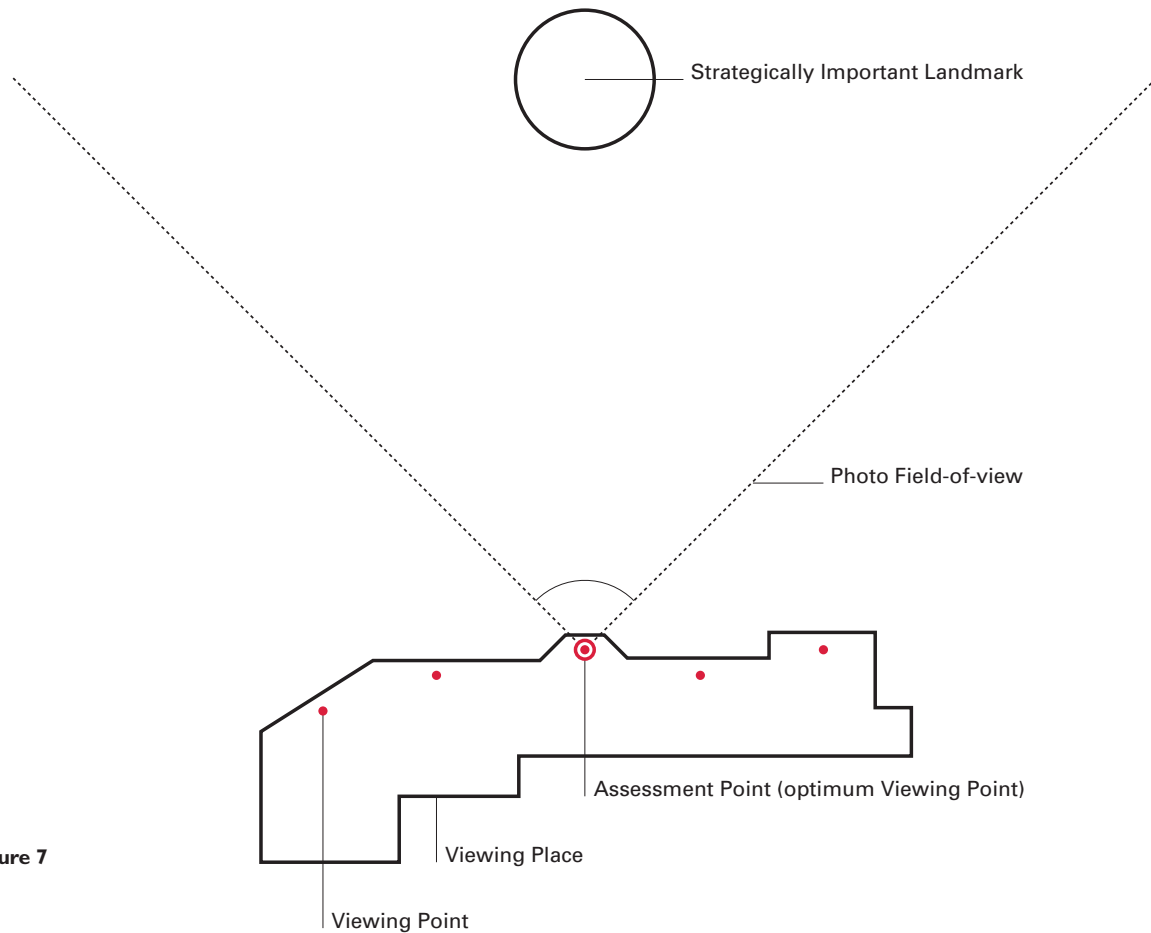


Figure 7

¹⁰ The Revised LVMF SPG (2010) includes changes to the description of a designated view (Mayor of London 2010, 18). The revised and additional definitions are included in the Glossary.

Although this methodology has been devised to be compatible with the London View Management Framework (LVMF), it needs to be applicable to other national, regional and local views both inside and outside London. It is therefore important to ensure that the terms Viewing Place, Assessment Point, and Viewing Point are clearly understood¹⁰. A diagram showing how the Viewing Place, Assessment Point, and Viewing Points relate to one another is provided above.

The Viewing Place is an area within which the Assessment Point and any agreed additional Viewing Points are located and which is publicly accessible and well used. A Viewing Place may or may not have well defined physical boundaries.

The formal Assessment Point, as defined in the LVMF, is a specific location within the Viewing Place that forms a reference point for the assessment of a view. Formal Assessment Points are defined for all the designated views in the LVMF. For views not in the LVMF Assessment Points should be chosen and each identified by an Ordnance Survey grid reference. In heritage terms, the Assessment Point should describe the optimum point from which heritage significance within the view may be best appreciated. However, it is important to note that the Assessment Point may not always provide the most relevant point from which to assess the impacts of a specific development proposal.

In London the revised LVMF (Mayor of London, 2010) allows for additional Assessment Points to be identified by the local planning authority during the scoping process.

FIGURE 8 Plans and diagrams should be used to help describe the Viewing Place and Assessment Point.

MAPS TO ACCOMPANY THE VIEW ANALYSIS

Plans and diagrams should be used to help describe the Viewing Place and Assessment Point. Background mapping should be based on Mastermap™ where possible and should be at an appropriate scale to represent the nature and extent of the view.

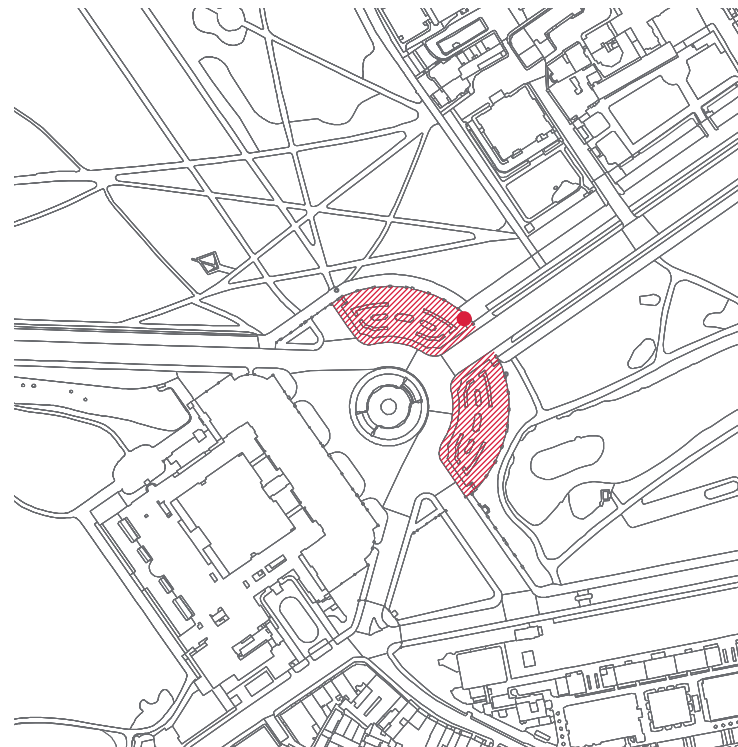


Figure 7

Reproduced from Ordnance Survey information with the permission of The Controller of Her Majesty's Stationary Office. Crown Copyright. Land Use Consultants. License Number 100019265
Source: English Heritage

 VIEWING PLACE

 ASSESSMENT POINT

PHOTOGRAPHS TO ACCOMPANY THE VIEW ANALYSIS

CHOOSING THE LOCATION FOR PHOTOGRAPHY

Some Viewing Places give rise to dynamic viewing experiences (for example views from bridges crossing rivers). The photographs to illustrate the view should therefore be able to:

- illustrate the optimum point for appreciating the heritage significance within a view;
- illustrate the way in which heritage assets are perceived as one moves through the Viewing Place.

METHOD FOR PHOTOGRAPHING VIEWS

The method for photography should be consistent – it should include the use of a fixed camera height (at 1.6m above ground level to match that used in the London View Management Framework), and a fixed focal length. In most visual assessment situations, it is recommended that a camera with a 50mm standard lens (35mm film camera) is used because this most closely approximates to the human eye (Landscape Institute 2002, 63; 2011; Scottish Natural Heritage 2006, para. 125). Where a digital camera is used, the conversion factor should be obtained to ensure that the equivalent focal length is set to match close to 50mm on a standard lens (this ratio is different for different cameras).

A tripod with horizontal and vertical spirit levels should be used to provide stability and is especially useful when creating a series of adjoining photographs for use in photo-stitching software. In addition, the use of a tripod head specially adapted for panoramic photography can avoid distortion (or parallax).

It should be noted that photographs can only represent an illustration of a view at a given point in time and cannot capture all that can be seen by the naked eye. Photographs are therefore no substitute for visiting the actual Viewing Place.

PRESENTATION

The photograph from the main Assessment Point(s) should illustrate the full extent of the view. A second photograph from the same Assessment Point should use colour washes to highlight World Heritage Sites, scheduled monuments, listed buildings (grades I, II* and II), registered parks and gardens, registered battlefields and conservation areas (if relevant), and be annotated to show the location of heritage assets and other features.

Photographs should be used to illustrate the kinetic nature of views, where relevant.

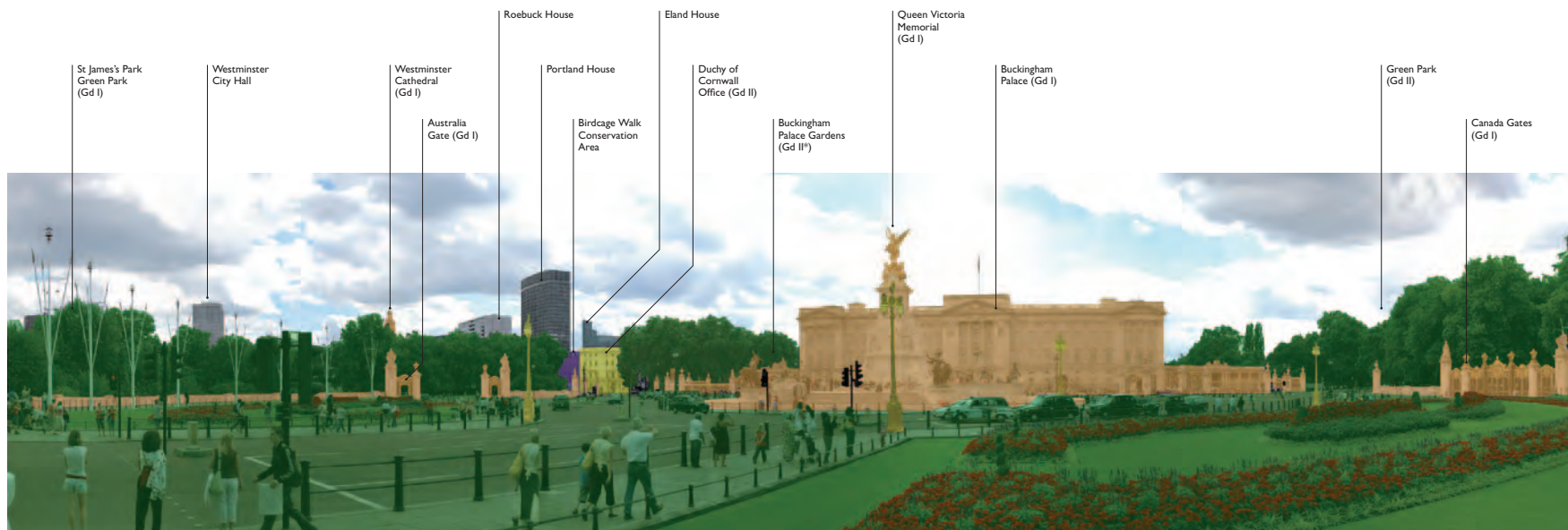
For each Assessment Point photographs with annotations to indicate the location of features described in the text, and with colour washes to illustrate heritage assets in the view.

Figure 9 Existing view (July 2007) – see Figure 8 for Assessment Point location.



Figure 10 Location of Listed Buildings (grades I, II* and II), SAM's, Non-Listed Buildings in Conservation Areas and Historic Parks and Gardens.

Photographs © Land Use Consultants



Photography information:

Viewpoint location (grid reference):	529217,179809
Ground height / camera height (AOD):	xxm / 1.60m
Date and time of photography:	24/07/07 16:14
Field of view / number of shots taken:	137o / 9

- Grade I Listed Buildings and/or SAM
- Grade II and II* Listed Buildings
- Non-Listed Buildings/Structures in a Conservation area
- Historic Parks and Gardens

Photographs should be used to illustrate kinetic nature of views.

Figure 11 View from The Mall to Queen Victoria Memorial and Buckingham Palace on the eastern side of the rond-point at the south-eastern end of The Mall.



Figure 12 View from The Mall to Queen Victoria Memorial and Buckingham Palace, on the northern side of the rond-point at Canada Gate. Photographs © Land Use Consultants



Figure 13 View from The Mall to Queen Victoria Memorial and Buckingham Palace after dark
© Land Use Consultants



A night-time photograph from the Assessment Point should also be provided to illustrate the heritage assets by night.

All photographs should be accompanied by information identifying camera point location, ground height and camera height AOD (Above Ordnance Datum), field of view, and the type of camera and lens used. If photo-stitching software has been used to create panoramic views, then the number of shots, viewing angle and type of software used should also be noted.

It is important to note that the views will change over time and it will be necessary to update these from time to time. Archived material should be properly recorded, curated and publicly accessible – the use of images in public inquiries demands storage conditions in which the images are demonstrably tamper-proof.

A NOTE ON LIGHTING AND WEATHER CONDITIONS

Visibility is an important consideration when photographing views. Site visits should be planned around clear days with good visibility. Viewpoint locations should then be visited according to the time of day and orientation of the sun to ensure that the view in question is lit from behind or from one side of the viewer. South-facing viewpoints present a potentially difficult situation, particularly in winter when the sun is low in the sky causing buildings to appear in silhouette. Extra attention may need to be given to such viewpoints in terms of timing.

In some cases, it will be beneficial to represent a view under differing lighting conditions, in different seasons, or at night.

RIGHT A late 1940s photograph of BOAC Short Solent flying boat *City of London* moored on the River Thames beside the Tower

© English Heritage



TESTING PHASE A BASELINE ANALYSIS: ESTABLISHING THE BASELINE SIGNIFICANCE OF HERITAGE WITHIN A VIEW

The method for Phase A analysis has been tested on the Townscape View from City Hall to the Tower of London (designated view 25 in the LVMF 2010). This worked example was chosen because it is a designated view in the London Plan, it has particular heritage significance associated with it, and is a view of a World Heritage Site that is currently subject to change. This is a complex and strategically important view and of great significance. The analysis of most other views will be simpler and shorter.

PHOTOGRAPHY

The photographs were taken using a Nikon D80 digital camera with a Nikkor 35mm f/2D fixed focal length lens. The conversion factor for the Nikon D80 is 1.528. Therefore a 35mm lens on a Nikon D80 digital camera is equivalent to a 53mm lens on a standard 35mm film camera. The camera was mounted on a Manfrotto tripod at a height of 1.6m with Manfrotto 303 Panorama Head on a Manfrotto 338 Levelling Base. The use of the panoramic head attachment reduced the effect of parallax when taking a panorama sequence. PTGui version 6.0.3 software was used to stitch the images together to achieve a seamless panoramic photo.

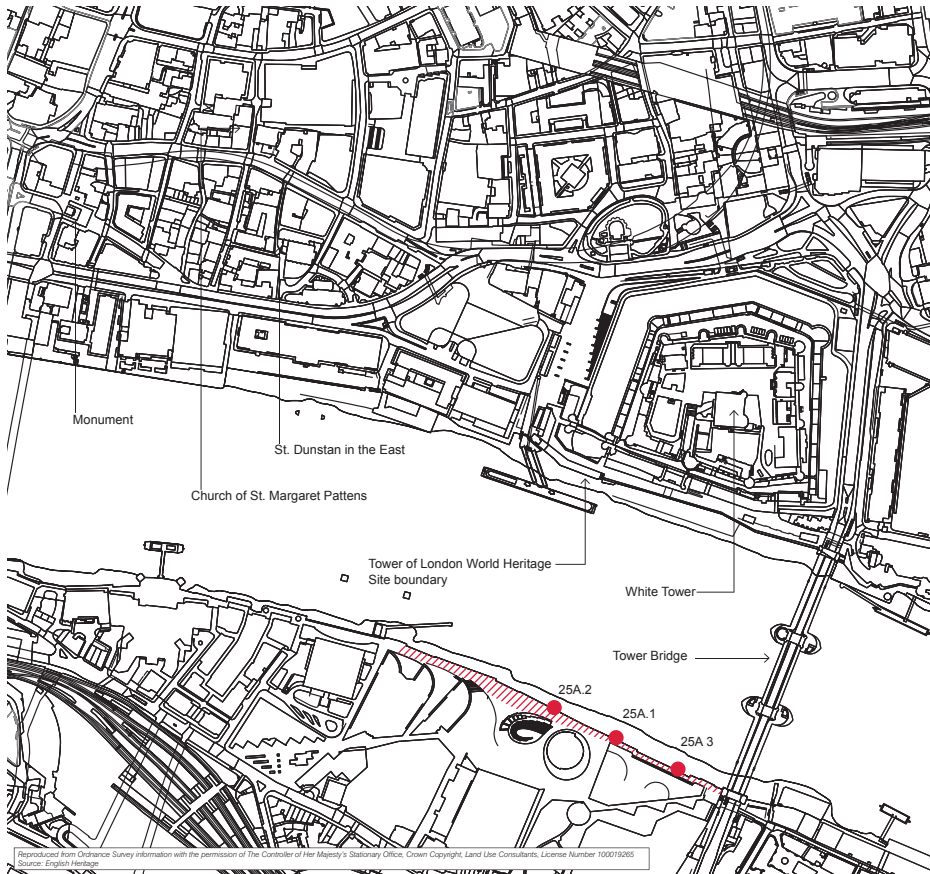


FIGURE 14
Location Plan showing the Viewing Place & Assessment Points. Phase A Assessment: The Queen's Walk to Tower of London.

Photographs © Land Use Consultants

VIEW NAME THE QUEEN'S WALK TO TOWER OF LONDON

STEP 1

ESTABLISHING REASONS FOR IDENTIFYING THE VIEW AS IMPORTANT

REASONS FOR SELECTION

The view from this Viewing Place forms one of the designated views in the London View Management Framework (LVMF, Mayor of London 2010). The view focuses on the Tower of London, a 'strategically important landmark' as defined in the LVMF. The Viewing Place is described in the LVMF as the Queen's Walk, adjacent to City Hall. HMS Belfast frames the view to the west and the southern abutment of Tower Bridge frames the view to the east. Three formal Assessment Points have been identified in the LVMF. These are Assessment Point 25A.1 at the foot of the pathway from Potter's Fields, Assessment Point 25A.2 in front of the public terraces and 25A.3 close to Tower Bridge at the eastern end of the Queen's Walk. The locations of these Assessment Points are shown in plan form in Figure 9.

The view from this Viewing Place has been selected for analysis by English Heritage because it is long-established and provides the best view of the Tower of London to illustrate the heritage significance of this World Heritage Site (including its 'Outstanding Universal Value'). The analysis has been undertaken predominantly from the three LVMF Assessment Points. Additionally, photographs from a number of locations along the Queen's Walk show the kinetic effect of moving through the Viewing Place.

● ASSESSMENT POINT
 ▨ VIEWING PLACE



FIG 15 Samuel and Nathaniel Buck, South View of the Tower of London with boats and figures, pen and wash, 1737 (Guildhall Library Print Room, City of London, record no. 22530).



FIG 16 John Crowther, View of the Tower of London at low water, from Pickle Herring Wharf with boats on the Thames, watercolour, c. 1883 (Guildhall Library Print Room, City of London, record no. 17911).



Images © City of London, London Metropolitan Archives

HISTORY OF THE VIEW FROM THIS VIEWING PLACE

The Tower of London, centred on its keep, the White Tower, was always intended to be conspicuous, from the time of its construction in the 11th century. This is especially true of its visibility from the present Viewing Place, across the River Thames. The Tower, as a fortress, was meant to be prominent and to have a clear field of view around it. The Tower was positioned so as to dominate London (until the end of the 19th century the White Tower was the tallest building in the City of London after St Paul's Cathedral) and to be able to control the approaches to London, especially by river from the sea. The view of The Tower from the river, or from the south bank, was often the first impression that travellers arriving in London had of the city.

Topographical views of London, the earliest being from the 16th century, frequently depict the city seen from the south bank, and this was almost always the direction of view chosen to depict The Tower. Typical examples from different periods include a pen-and-ink drawing of London from the south by Anthonis van den Wyngaerde (1544), a pen-and-wash drawing of The Tower seen from across the river by Wenceslaus Hollar (c 1660), a pen-and-wash drawing by Samuel and Nathaniel Buck (1737, Fig 15) and a watercolour by John Crowther (c 1883, Fig 16).

In 1828 St Katharine's Dock was opened to the east of The Tower, surrounded by six-storey brick warehouses, and in 1886–94 Tower Bridge was constructed in a Gothic revival style, between the Dock and The Tower. In the second half of the 20th century the scale of buildings grew, especially in the City to the west of The Tower. The view of The Tower from the south bank of the Thames, directly opposite the White Tower, has remained relatively unchanged, however, and seen from City Hall, the White Tower is still the most prominent element at the centre of the panorama.

In the 1950s building regulations and planning laws that had limited the height of buildings in London were relaxed, and high-rise buildings began to appear on the City skyline. Those visible from the Viewing Place include Britannic House (122m, 1967), Kleinwort Benson (91m, 1967), CGNU Tower (118m, 1969), Hong Kong Bank (104m, 1975) and the Barbican residential towers (128m, 1979). HMS *Belfast* was permanently moored just upriver from The Tower in 1971, and The Tower Hotel was built just to the east of The Tower in 1975, 48m high.

The 1980s saw more tall buildings added to the City skyline: Tower 42, formerly the Nat West Tower (183m, 1980), Baring Brothers (88m, 1981) and Lloyd's (84m, 1986).

One America Square, which rises above the skyline behind The Tower, was completed in 1990. 30 St Mary Axe (180m), in the 'City cluster' of high-rise buildings, was completed in 2003, as was the low-rise Bowring Building in Tower Place, immediately to the west of The Tower. Broadgate Tower was completed in 2008, Heron Tower (203m) is due for completion in 2011 and Bishopsgate Tower (288m) in 2012. Other tall buildings that will appear in the view from this Viewing Place and have received planning permission include the Leadenhall Building (225m) and 20 Fenchurch Street (160m, work started on site).

STEP 2

IDENTIFYING WHICH HERITAGE ASSETS IN THE VIEW MERIT CONSIDERATION

The view from this Viewing Place contains ten heritage assets (i.e. World Heritage Sites, listed buildings, scheduled monuments, registered parks and gardens, registered battlefields and conservation areas). These have each been considered for inclusion in the assessment based on:

- their designation or importance in a local context
- the degree to which their heritage significance can be appreciated from the Viewing Place
- whether this may be the best (or only) place to view the historic significance of the heritage asset
- whether their significance is enhanced or diminished as a result of being seen in combination with other heritage assets in the view.

The **Tower of London** is inscribed as a World Heritage Site and a scheduled monument, and many of its elements are listed buildings. It forms the focus of the view from the Viewing Place. This Viewing Place gives a view of The Tower from which the organisation of the complex of buildings, and particularly the prominence of the White Tower, can best be appreciated. The Tower is therefore included in the assessment below.

Tower Bridge is a grade I listed structure whose architectural and engineering significance can be appreciated from this Viewing Place. This Viewing Place provides a particularly spectacular view of the bridge, which forms a major component of the view. It is therefore included in the more detailed assessment below.

Three **City Churches** (St Margaret Pattens, St Dunstan in the East and All Hallows Barking (by the Tower) visible in this view are listed grade I. Their value as heritage assets is high, but only their spires are visible from this Viewing Place. Their prominence in the view is low as a result of distance to the churches, and the backdrop of existing buildings. However, this is one of the few viewpoints from which the churches, which represent Wren's city skyline after the Great Fire, may be appreciated together. They have therefore been included further in the assessment below.

The **Monument** is a Scheduled Monument and grade I listed building. Although there are better places from which to view the Monument on its own, its significance as a marker of where the Great Fire of 1666 started, and the relationship of this to both the City and The Tower, are better appreciated from the Viewing Place. The City churches, representing the rebuilding of the City after the Fire, can also be seen in relation to the Monument from the Viewing Place. The Monument is therefore included in the assessment below.

Custom House is a grade I listed building. Although its Greek Revival façade is of interest, this is mostly hidden by trees from this Viewing Place. The significance of the asset does not benefit from being viewed in combination with other heritage assets from this viewpoint. For these reasons it is not considered in further detail below.

Trinity House is a grade II* listed building. Only part of this fine building is visible in the view, and the Viewing Place is not considered the best place from which to see it. There is no benefit in seeing this heritage asset in combination with other assets in this view, and it is therefore not considered in more detail below.

Billingsgate Market is a scheduled monument and grade II listed building. Although it has a grand façade, the building forms a minor component of this view and there are better places to view this asset. The structures of archaeological interest, for which it is scheduled, are hidden below ground. It does not benefit from being viewed in combination with other heritage assets from this viewpoint. For these reasons it is not considered in further detail below.

The **Barbican Towers** are part of a complex that is listed grade II for its integrated townscape and reinforced concrete construction. This significance can best be appreciated when viewed at close quarters. The significance of the asset does not benefit from being viewed in combination with other heritage assets from this viewpoint. For these reasons it is not considered in further detail below.

The **Tower Conservation Area** is a locally designated heritage asset. The Tower of London forms a central part of the conservation area (and will be investigated in more detail below). The remainder of the area's special character cannot be appreciated from this viewpoint. It is therefore not considered in further detail below.

The **Trinity Conservation Area** is a locally designated heritage asset. Only the top of the tower of Trinity House and part of the façade of the offices on Byward Street are visible from this viewpoint. The area's special character cannot be appreciated from this viewpoint and it is therefore not considered in further detail below.

LVMF ASSESSMENT
POINT 25A.1

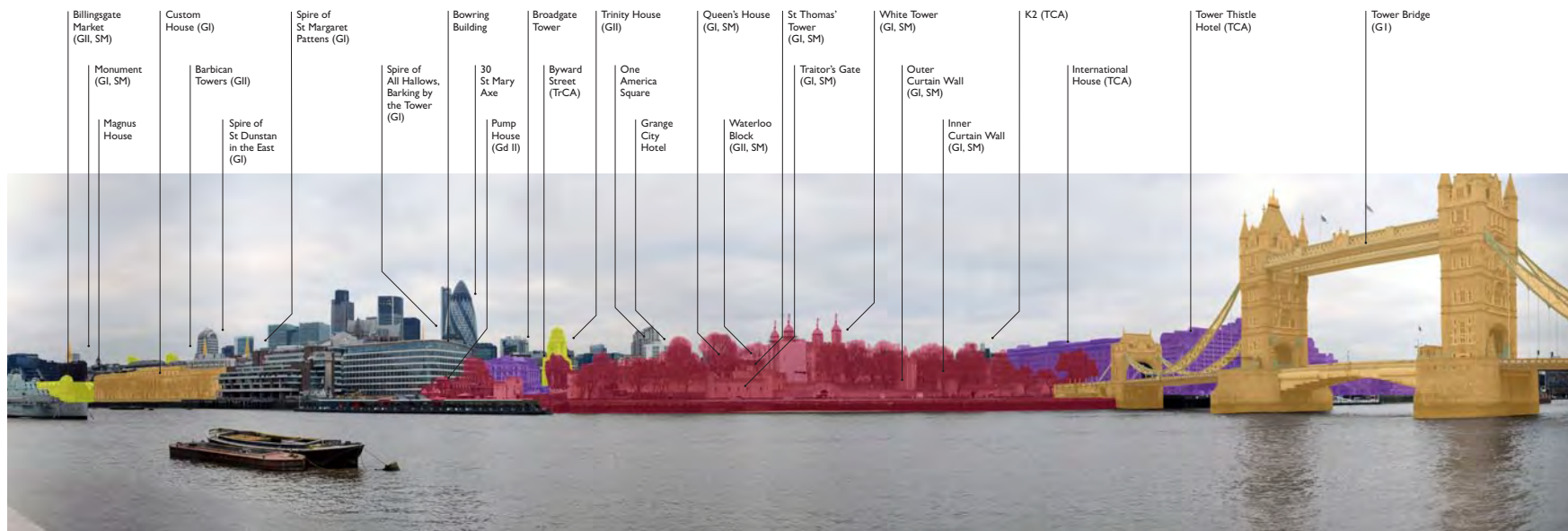
Figure 17 Existing view (Jan 2011)
– see Figure 14 for Assessment
Point location



Figure 18 Locations of World Heritage Sites, Listed Buildings (grades I, II* and II) and Scheduled Monuments with the key built components referred to in text.

Note: TCA – Tower Conservation Area.
TrCA – Trinity Conservation Area

Photographs © Land Use Consultants



Photography information:

Viewpoint location (grid reference):	533485,180201
Ground height / camera height (AOD):	4.5m / 6.1m
Date and time of photography:	11/01/11 15:56
Field of view:	120°

- World Heritage Sites
- Grade I Listed Buildings and/or SAM
- Grade II and II* Listed Buildings
- Non-listed buildings in a Conservation Area

STEP 3

ASSESSING THE
SIGNIFICANCE OF INDIVIDUAL
HERITAGE ASSETS

The following section analyses each of the heritage assets selected above, to help understand the heritage significance of each asset in the view.

Sources of information for this worked example include site visits, supported by the *Tower of London World Heritage Site Management Plan* (Historic Royal Palaces 2007), conservation area statements and appraisals, listed building descriptions, scheduled monument citations and other works (referenced in the footnotes). Additional specialist information was obtained from English Heritage staff, in a seminar-workshop.

The location of the heritage assets is illustrated in Figures 17-22 (for Assessment Point 25A.1, 2, 3). The assets are analysed in order of their importance in the view, starting with The Tower of London.

TOWER OF LONDON
WORLD HERITAGE SITE

DESCRIPTION OF ASSET

Seen from this Viewing Place, the visible buildings of The Tower of London are the **White Tower** (listed grade I), a Norman keep under construction by 1077 and completed about 1100; the 12th-century **Inner Curtain Wall** (listed grade I) and three of its towers, the Bloody Tower; Wakefield Tower and Lanthorn Tower; the 13th-century **Outer Curtain Wall** (listed grade I) with three towers clearly visible, Middle, Byward and St Thomas's; the 16th-century timber-framed **Queen's House** (listed grade I) just visible beyond the Inner Curtain Wall to the west of the White Tower; the 17th-century **New Armouries** (listed grade I) in red brick, just visible especially

in winter beyond the Inner Curtain Wall to the east of the White Tower; the 19th-century **Waterloo Barracks** (listed grade II), just visible to the west of the White Tower; beyond the Queen's House; and Salvin's 19th-century Gothic Revival **Pump House** (listed grade II) on the river front, to the west of the Middle Tower.

HISTORY

William the Conqueror began construction of a castle in the south-eastern corner of the walled city of London, on the site of Roman fortifications, soon after the Norman Conquest of England in 1066. The White Tower, completed about 1100, is the oldest surviving part of this castle, and formed the keep, surrounded by open spaces and much smaller buildings on the site of the present Inner Ward. One hundred years later a new curtain wall and tower were built, parts of which are incorporated in the present Inner Curtain Wall, and the first residential quarters for the king, outside the keep, were added to the south.

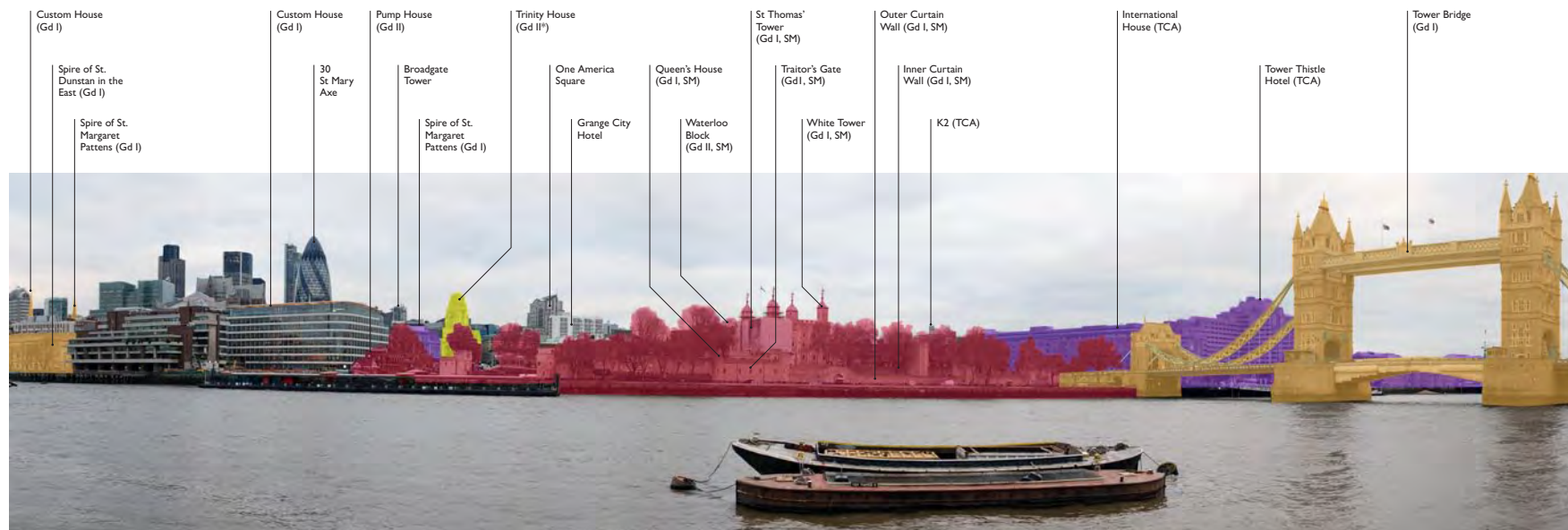
The castle was greatly enlarged and developed in the 13th century, by Henry III and Edward I. The Inner and Outer Curtain Walls and new towers were built and the present moat was dug. The landward entrance from the west was through the Beauchamp Tower, rebuilt deliberately to appear intimidating, while St Thomas's Tower projected into the river, over a watergate, with relatively large windows lighting the royal apartments. From the 13th century the keep was whitewashed to appear more conspicuous, receiving its name of the White Tower; and an area of land around the outside of the moat was taken under royal control, as the Liberty of the Tower, to be kept free of obstacles (Keay 2001). The Outer Curtain Wall was raised to its present height in the 14th century.

LVMF ASSESSMENT
POINT 25A.2

Figure 19 Existing view (Jan 2011)
– see Figure 14 for Assessment
Point location.



Figure 20 Key built components
referred to in text.
Photographs © Land Use Consultants



- World Heritage Sites
- Grade I Listed Buildings and/or SAM
- Grade II and II* Listed Buildings
- Non-listed buildings in a Conservation Area

Photography information:	
Viewpoint location (grid reference):	533428,180230
Ground height / camera height (AOD):	4.5m / 6.1m
Date and time of photography:	11/01/11 16:22
Field of view:	120°

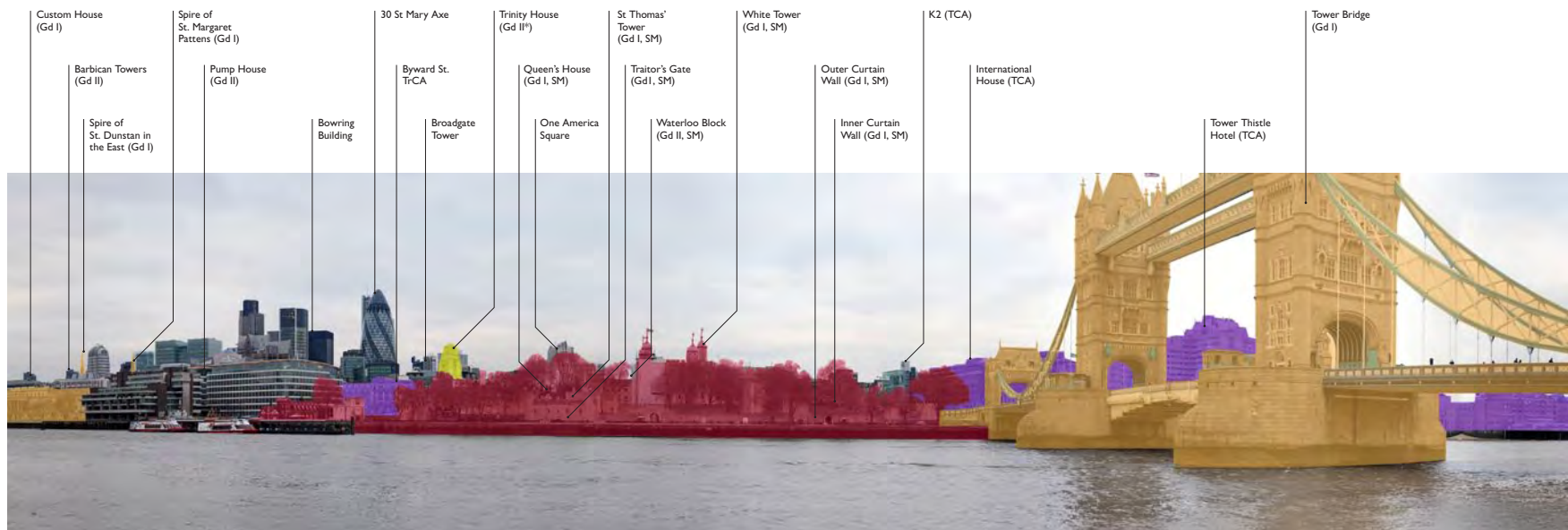
LVMF ASSESSMENT
POINT 25A.3

Figure 21 Existing view – see Figure 14 for Assessment Point location.



Figure 22 Key built components referred to in text.

Photographs © Land Use Consultants



Photography information:

Viewpoint location (grid reference):	533550,180168
Ground height / camera height (AOD):	4.5m / 6.1m
Date and time of photography:	11/01/11 16:11
Field of view:	120°

● World Heritage Sites

● Grade I Listed Buildings and/or SAM

● Grade II and II* Listed Buildings

● Non-listed buildings in a Conservation Area

From the 16th century, despite construction of the Queen's House, The Tower was no longer used as a royal residence, but it continued to be the main military storehouse and state prison of the kingdom, as well as accommodating the royal mint and the royal menagerie. The Tower was no longer independently defensible and surrendered to parliament in 1642, at the beginning of the Civil War. Firearms and cannon were tested in The Tower; and the White Tower was used mainly to store gunpowder. The Great Fire of 1666 fortunately did little damage to The Tower; although subsequently many buildings around the White Tower were cleared away as a precaution. The late 17th-century New Armouries are the oldest surviving purpose-built Ordnance buildings in Britain.

In the 18th century fires destroyed the remaining medieval palace buildings, and new offices and storehouses were built in their place. A gate and drawbridge were constructed at the east end of the Outer Curtain Wall to give access to the wharf, from where vessels in the river were armed and supplied. In response to need during the Napoleonic Wars, in 1803 a small-arms factory was built on the wharf.

In 1843 the moat was drained, and in 1845 the Waterloo Barracks were opened. The local defences of The Tower were modernised, with gun ports in the walls and firing platforms on casemates behind them. Official departments such as the Royal Mint, the Ordnance Survey and the public records were moved out and, although the menagerie was closed by then, The Tower was regularly opened up to public visits, becoming a showplace in itself and decoratively exhibiting arms and armour, and the rehoused Crown Jewels. In keeping with this function many of the buildings of The Tower were restored to what was thought to be their original medieval appearance.

The present main open space inside The Tower, Tower Green, was laid out in the mid 19th century; an avenue of trees was planted on the parade ground and by 1870 the whole Green was paved with

irregular cobblestones. In 1878 Tower Wharf was cleared of buildings, laid out as a public esplanade and plane trees were planted. Trees were also planted between the Inner and Outer Curtain Walls.

THE LOCAL SETTING

The area that immediately surrounds the Tower has, generally, provided a clear defensive open space, known as the Liberties, over which the Tower had jurisdiction. Although buildings have encroached from time to time it has generally maintained its approximate outline, the construction of Tower Bridge, the main roads and Tower Hill underground station aiding this process. The Tower's control over the Liberties passed at the end of the 19th century, to the Metropolitan Borough of Stepney.

CHANGES EXPERIENCED WHEN MOVING THROUGH THE VIEWING PLACE

Photographs taken from three points along different parts of the Queen's Walk represent the kinetic nature of the view – these are illustrated on page 47. As one moves from east to west along almost 400m of the Queen's Walk the Tower of London forms the main focus of the view. However, the Tower's relationship with its context changes – the most obvious change is the way in which the Tower is seen against its backdrop. At the eastern end of the Queen's Walk, adjacent to Tower Bridge (Figure 23), the tall buildings of One America Square and the Grange City Hotel appear beside the White Tower and 122 Leadenhall Street appears behind the former Port of London Authority's tower. The Broadgate Tower (under construction) is visible on the skyline behind the Traitors Gate of the Tower of London where it appears as an outlier to the main cluster of tall buildings in the city. 30 St Mary Axe (commonly called 'The Gherkin') also appears to lie to the right of the main cluster of tall buildings in the city from this viewpoint.

PHOTOGRAPHS TO
SHOW KINETIC NATURE
OF VIEW

Figure 23 From the east end of
Queen's Walk, adjacent to Tower Bridge

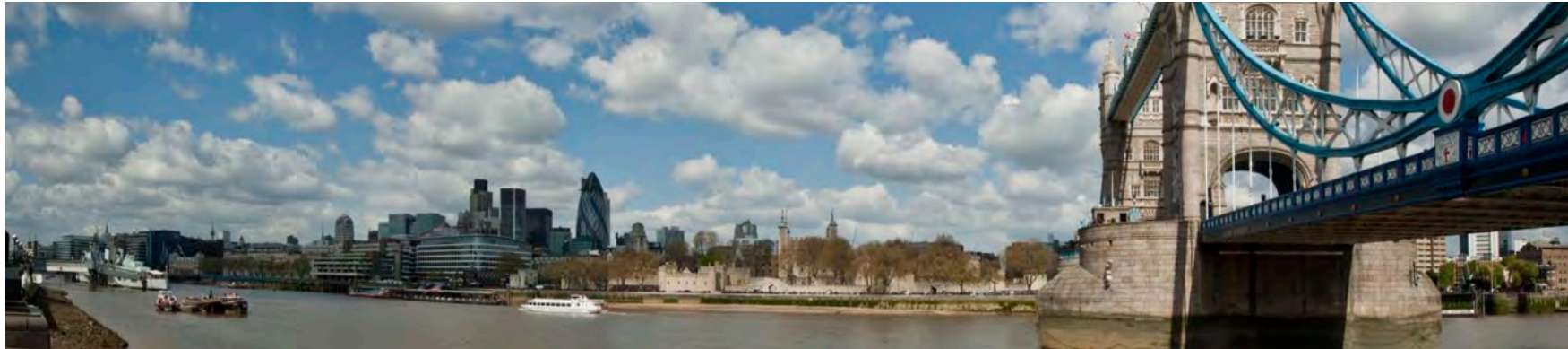


Figure 24 View from riverwall,
opposite arena

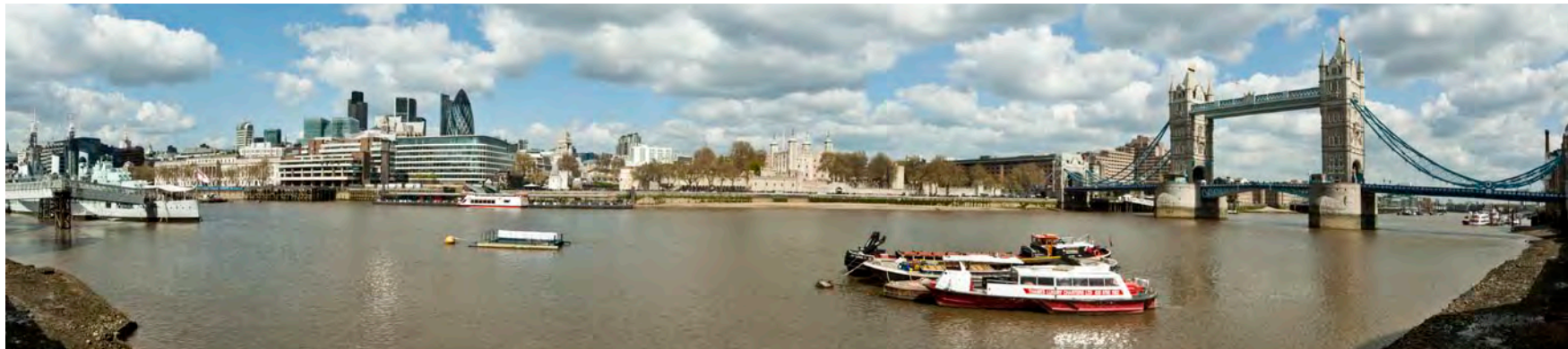


Figure 25 View from the west end of
the Viewing Place, near the entrance
to HMS *Belfast*

Photographs © English Heritage



As one moves west along the Queen's Walk, One America Square and the Grange City Hotel move away from the White Tower, and the Broadgate Tower moves behind the former Port of London Authority's tower, towards the main cluster of tall buildings in the city (Figure 24). From Assessment Point 25A.1 at the foot of the pathway from Potter's Fields, the White Tower and former Port of London Authority's tower are both seen against open sky with One America Square and the Grange City Hotel visible midway between the two. The Broadgate Tower is located just to the left of the former Port of London Authority's tower and 30 St Mary Axe (commonly called "The Gherkin") appears to form part of the main cluster of tall buildings in the city.

As one moves further west, One America Square and the Grange City Hotel move further away from the White Tower, and the Broadgate Tower move further away from the Port of London Authority tower until at the second of the three formal Assessment Points near the water's edge opposite the entrance to the 'Scoop' (Assessment Point 25A.2), One America Square and the Grange City Hotel are between the Middle Tower and Byward Tower of the Tower of London. One America Square and the Grange City Hotel are as prominent as the landmarks of the White Tower and the former Port of London Authority's tower, and 30 Saint Mary Axe forms part of the cluster of tall buildings in the city.

As one moves further west towards the entrance to HMS *Belfast* (Figure 25), the White Tower remains visible against open sky, although the modern façade of the Société Générale building rises behind the curtain walls of the Tower of London. As one approaches the entrance to HMS *Belfast*, the ship obscures views to the Tower of London.

SEASONAL/NIGHT-TIME VARIATIONS

The trees along Tower Wharf and inside The Tower screen some of The Tower buildings during the summer months, although the White Tower is easily visible. In winter more buildings in the backdrop are visible. At night the Tower is floodlit, as is Tower Bridge, making them the dominant elements of the view (Figure 26).

HERITAGE VALUES OF THE TOWER OF LONDON

The following section ascribes value and significance to the Tower of London as a heritage asset. This is based on English Heritage's *Conservation Principles* (2008, 28–32), which set out a 'family' of heritage values that may be used to prompt comprehensive thought about the values of a place. This approach is adopted in consideration of all the heritage assets that have been selected in the scoping process.

The Tower of London is acknowledged as the single most important work of military architecture in England (Impey and Parnell 2000). The White Tower, the oldest surviving building of the 11th-century castle, is primary evidence of the original fortress built by William the Conqueror to dominate London and control access to the city, especially upriver from the sea. The White Tower is the foremost example of Norman military architecture in the country, and is a key prototype building in the development of the Norman palace-keep. St Thomas's Tower is a rare survival of a royal palace of the reigns of Henry III and Edward I, and the addition of the Outer Curtain Wall and its towers is an excellent example of concentric castle design. This represents the culmination of The Tower's development as a medieval castle, around 1300, and the design embodies both military practicality and the aim of impressing and intimidating the viewer, comparable with Edward I's castles in north Wales.

LVMF ASSESSMENT POINT 25A.1

Figure 26 Nighttime existing view
(Jan 2011) – see Figure 14 for
Assessment Point location

Photographs © Land Use Consultants



Photography information:

Viewpoint location
(grid reference): 533485,180201

Ground height /
camera height (AOD): 4.5m / 6.1m

Date and time
of photography: 11/01/11 18:10

Field of view: 120°

Historically, The Tower not only represents the Norman Conquest of England, but was both a pre-eminent symbol and a strong instrument of royal power adjacent to the richest and most populous city in the country. Significantly The Tower is not, and has never been, within the City of London. When a medieval king was present, it was the seat of government; as the chief royal residence in medieval London, it was where coronation processions started (the last to do so was in 1661); it was a constant physical expression of royal power. Given its size and position on the Thames, next to London, The Tower came to house important state functions: first and foremost, a store of military weapons and equipment (including guns and gunpowder in quantity from the end of the 15th century); a mint (until 1810); a prison (especially for political and religious prisoners, notably in the 16th and 17th centuries); a library of state records (until 1858); a store of valuables (notably, after the Restoration in 1660, the Crown Jewels); and a menagerie of exotic animals, usually foreign gifts to the king (until 1835).

The aesthetic value of The Tower is the product of conscious design. The imposing fortress architecture of the White Tower was deliberate; the walls of the building are higher than the original roof level, to overawe as well as for military advantage. Similarly the Outer Curtain Wall and its towers were intended to impress. The scale and prominence of the White Tower can be appreciated in many places, but is particularly noticeable when seen against open sky, most clearly from the south bank of the river. A 19th-century romantic view of The Tower as a fateful place, exemplifying and illustrating English history, though it had antecedents and is current today, was given concrete form by 'remedievalising' the appearance of the buildings, to designs by Salvin and Taylor. The words 'Traitors' Gate' were painted in huge letters above the watergate in St Thomas's Tower.

From the latter part of the 19th century trees have been planted along the river front and inside the walls, softening the severity of the architecture. The trees along the wharf and inside the Outer Curtain Walls can be easily appreciated in this view.

Only the more utilitarian and unimportant elements of The Tower's architecture are likely to be a product of unconscious design. The Tower has always been perceived as important and very few of its buildings are likely to have been erected without some regard to the suitability of their appearance. The Queen's House and the New Armouries are both good examples of the architecture of their respective periods, the latter being the oldest purpose-built Ordnance building in the country. It was not until the first half of the 19th century that architects chose to clothe new buildings in a Gothic Revival style, to conform to the perceived prevailing medieval ethos of the place.

The Tower also has a communal value, in the terms of English Heritage's conservation principles, evoking as it does past events and lives; The Tower can be seen as a stage on which history has been enacted. The place is, or has been, home to many activities that have communal significance. The Tower remains a symbol of the English Crown, where for instance gun salutes are fired over the river on state occasions and the regalia are on public display. The Tower houses the headquarters of the Royal Armouries, the Chapels Royal and the Royal Regiment of Fusiliers, and is still a partly residential, daily working community.

OUTSTANDING UNIVERSAL VALUE OF THE TOWER OF LONDON

The 'outstanding universal value' of the Tower of London World Heritage Site (WHS) provides the justification for inscription of the site on the World Heritage List (UNESCO 2008). The Tower of London's outstanding universal value is attributable to the following cultural qualities, which are listed in the WHS Management Plan (Historic Royal Palaces 2007, 81–83).¹²

- landmark siting, both for protection and control of the City of London;
- symbol of Norman power;
- outstanding example of late 11th-century innovative Norman military architecture;
- model example of a medieval fortress palace which evolved from the 11th to 16th centuries;
- association with state institutions;
- setting for key historical events in European history.

SIGNIFICANCE OF THE TOWER OF LONDON AS HERITAGE ASSET

The statement of significance summarises the heritage values of this asset as follows:

- the most important work of military architecture in England, exemplifying the medieval military heritage of the nation – the architectural form of the White Tower;
- its landmark siting as a riverside gateway, both for protection and control of the City of London;
- one of the foremost examples of Norman architecture in the country and a symbol of Norman power;

- on outstanding example of concentric castle design;
- a stage upon which history has been enacted is one of the key elements of its iconic status;
- it represents the development of state institutions, particularly the nation's defences, its repository of official documents, its coinage and its prison;
- restoration works by Salvin and others in the 19th century;
- the presence of surviving buildings and structures from many periods;
- a symbol and reflection of the power of the English Crown.

SIGNIFICANCE OF THE TOWER OF LONDON IN THIS VIEW

The following are the aspects of the Tower of London's heritage significance that can be appreciated in the view:

- the view of the Tower of London from this Viewing Place reveals the strength and prominence of the White Tower, by day and by night, revealing the defensive origins of this riverside fortress, due to the low lying location of the Viewing Place and the moderate scale of buildings in its 'local setting', as defined in the WHS management plan;
- the view of the castellations and turrets of the White Tower against a clear (and, at night, dark) sky allows the viewer to understand and appreciate the architectural form of the White Tower. From Assessment point 25A.1 the White Tower is seen to best effect against a clear sky unaffected by modern development;
- the view of the Tower of London from the whole Viewing Place reveals the Tower's landmark site – its position on the edge of the City of London, and its role as a riverside gateway;

¹² The draft Statement of Outstanding Universal Value was submitted to the World Heritage Centre in February 2011 http://www.culture.gov.uk/what_we_do/historic_environment/4168.aspx

- the view of the Tower of London from the whole Viewing Place reveals one of the finest examples of medieval castle design in Britain.
- this view of the Tower of London from the whole Viewing Place reveals an image of the romantic castle, perfected in the 19th century by restoration works, and enhanced by its tree planting;
- St Thomas's Tower, a rare surviving example of a royal palace in the reigns of Henry III and Edward I, is clearly visible on the riverside below the White Tower from the whole Viewing Place;
- The Traitors' Gate, in the riverside wall, is also visible from the whole Viewing Place as a reminder of the use of the Tower as a prison.

TOWER BRIDGE

DESCRIPTION OF ASSET

Tower Bridge is prominent in the right hand side of the view. A low-level bascule bridge (ie a drawbridge, or a lifting bridge) which rises to let ships pass, and high-level footbridges, run between two tall stone towers on piers in the river. A suspended roadway approaches each tower from either bank. It is recognised as a landmark in the LVMF and is a grade I listed structure.

HISTORY

Commercial development in the East End of London in the second half of the 19th century resulted in the need for a new river crossing east of London Bridge that would still allow ships to pass into the Pool of London. A combined suspension and bascule bridge was designed by Sir John Wolfe Barry with architectural features by Sir Horace Jones. The Gothic revival style was required by Parliament,

'in deference to the neighbouring Tower of London' (Cherry and Pevsner 1983, 710) and the bridge was completed in 1894. The bascules, originally hydraulically operated, were electrified in 1976.

CHANGES EXPERIENCED WHEN MOVING THROUGH THE VIEWING PLACE

Tower Bridge provides a constant element, framing the eastern end of the view, as one moves through the Viewing Place. The main change relates to the angle at which it is viewed, and the way in which it relates to its backdrop. From the footpath through Potter's Fields the Tower Hotel fills the gap between the lower and upper decks of the bridge reducing the legibility of the bridge's form. As one moves west the hotel moves behind the north tower of Tower Bridge until, at Assessment Point 25A.1, the gap between the lower and upper decks of the bridge is seen against open sky. As one moves further west buildings in the far distance protrude just above the low deck.

SEASONAL/NIGHT-TIME VARIATIONS

Seasonal variations do not affect the way in which Tower Bridge is perceived in this view. By night, the bridge is the most brightly floodlit element of the view, drawing the eye (see Figure 26). Tidal variations also provide a changing element in the view, as does the bridge itself as it opens for passing river craft.

HERITAGE VALUES OF TOWER BRIDGE

The following section ascribes value and significance to Tower Bridge as a heritage asset. As in the case of the Tower of London (above) this is based on English Heritage's *Conservation Principles* (2008), which set out a 'family' of heritage values that may be used to prompt comprehensive thought about the values of a place.

Tower Bridge functions as a gateway to the City. The hydraulically operated elevating roadways are important engineered features of the bridge design, – although now electrified. This is the only bascule bridge on the Thames in London.

The bridge possesses aesthetic qualities generated by conscious design – the Gothic revival style was required by Parliament to fit with the neighbouring Tower of London. It also reveals a high quality of craftsmanship and an innovative design, exhibiting both suspension and elevating roadway features in one bridge. It has become an iconic image of London, being used on postcards and in guidebooks to the city.

SIGNIFICANCE OF TOWER BRIDGE AS HERITAGE ASSET

The statement of significance summarises the heritage values of this asset as follows:

- A remarkable fusion of innovative engineering and historicist architectural forms – exhibiting both suspension and elevating roadway features in one bridge and featuring hydraulically operated elevating roadways are of importance in terms of engineering design;
- It functions as a gateway to the City and the Pool of London;
- The architectural form of the bridge in Gothic revival style;
- The bridge symbolises the wealth of London as an industrial and maritime city in the late 19th century;
- It is an iconic image of London, being used on postcards and in guidebooks to the city;

SIGNIFICANCE OF TOWER BRIDGE IN THIS VIEW:

The following are the aspects of the Tower Bridge's heritage significance that can be appreciated in the view:

- the view reveals the fusion of innovative engineering and architectural form of the bridge – exhibiting both suspension and elevating roadway features in one bridge. The finest view of the bridge is from Assessment point 25A.1;
- the form and function of the bridge (including the operation of the elevating roadways) can be appreciated from the whole Viewing Place although it is best appreciated from Assessment point 25A.1 against an open sky;
- the view reveals the architectural detailing in a Gothic revival style related consciously to the Tower to its west;
- this view reveals the bridge's location next to the Tower of London and the City, and its function as a gateway to the city and Pool of London by day and by night;
- this view of Tower Bridge and the Tower of London is an iconic image that is internationally recognised.

CITY CHURCHES

DESCRIPTION OF ASSET

In front of the tall buildings of the City, the tops of the spires of three grade I listed churches can just be made out – St Margaret Pattens, St Dunstan in the East and All Hallows Barking, by the Tower. They are seen against a backdrop of buildings in the City.

HISTORY

St Margaret Pattens was first recorded in the 12th century and rebuilt in the 16th century (Bradley and Pevsner 1997, 235). After the Great Fire of 1666 (in which the old St Paul's and many parish churches were lost), Sir Christopher Wren, working with Commissioners appointed by Parliament, was responsible for rebuilding the cathedral and 51 of the parish churches. St Margaret Pattens was rebuilt to designs by Wren in 1684–7, with its polygonal lead-covered spire added in 1698–1702, possibly by Hawksmoor acting as Wren's assistant.

St Dunstan in the East was patched up after the fire and Wren added the steeple in 1695–1701. However, the church itself was rebuilt in 1817–21 by David Laing.

All Hallows Barking, is the only London church with standing fabric of Anglo-Saxon date (Bradley and Pevsner 1997, 184). The brick tower was built in 1658–9, unusually during the Commonwealth. The church was restored in 1884–95. Severe bomb damage resulted in reconstruction of the church in the 1950s. Its Baroque-style copper-clad spire was added in 1958, in a style reminiscent of Wren's spires.

CHANGES EXPERIENCED WHEN MOVING THROUGH THE VIEWING PLACE

The steeple of St Dunstan in the East is seen against an open sky when viewed from the east end of the Queen's Walk close to Tower Bridge. From further west the top of the spire of All Hallows can be seen against an open sky.

SEASONAL/NIGHT-TIME VARIATIONS

Seasonal variation does not affect the prominence or visibility of the spires. By night they are not prominent features of the view.

HERITAGE VALUES OF THE CITY CHURCHES

St Margaret Pattens, is a good example of a post-Great Fire Wren church. Its polygonal spire although Baroque in date is remarkably medieval in appearance. Its historical value is enhanced by the fact that it is still used for its original purpose. Its aesthetic values are intact; it represents a good example of Wren's later City church work when much was delegated to Hawksmoor; then Wren's assistant. The church has communal value as a place of worship.

The steeple of St Dunstan in the East provides a material record of Wren's work in rebuilding the city churches after the Great Fire (1695–1701). It is likely that the steeple, the only element rebuilt after the Great Fire, was designed to match the Gothic exterior of the church.

All Hallows, Barking, contains Anglo-Saxon fabric (reusing Roman material) and medieval fabric, which, with the brick tower (1658–9), provide an important material record of the church. It also has great spiritual value and is still used as a church.

SIGNIFICANCE OF THE CITY CHURCHES AS HERITAGE ASSETS

The statement of significance summarises the heritage values of this asset as follows:

- St Margaret Pattens provides a material record of a Wren church with one of the 'most remarkable of the late spires' (Bradley and Pevsner 1997, 235).
- The steeple of St Dunstan in the East provides a material record of a Wren's work in rebuilding the city churches after the Great Fire.
- The Gothic-revival style of the steeple of St Dunstan in the East contributes to its aesthetic value.

- All Hallows, Barking, contains the oldest standing fabric of any church in the City of London.,
- All three churches have a communal value as places of worship.

SIGNIFICANCE OF THE CITY CHURCHES IN THIS VIEW

The following are the aspects of the City Churches' heritage significance that can be appreciated in the view:

- although small components of this view, the spires of St Margaret Pattens and St Dunstan in the East are reminders of the rebuilding of the City after the Great Fire and of Wren's post-fire skyline;
- this view reveals two of Wren's spires in relation to the Monument, commemorating the Great Fire.

THE MONUMENT

DESCRIPTION OF ASSET

To the far left of the view the Monument is visible protruding above the dark wall of Magnus House. It is a fluted Roman Doric column on a tall pedestal, of Portland stone and standing to a height of 61.5m. It has a viewing balcony (accessed by spiral steps inside the column) and is topped by a gilt copper urn. Although it forms a relatively minor component of this view, its cultural significance is recognised in the LVMF where it is included as a landmark.

HISTORY

The Monument was built 1671–77 as a memorial to the Great Fire of London of 1666. The design was a collaboration between Wren and Hooke and the monument was built close to the point where the fire began. The present setting dates from the 1830s and the new London Bridge alignment (Bradley and Pevsner 1997, 322).

CHANGES EXPERIENCED WHEN MOVING THROUGH THE VIEWING PLACE

The Monument is most visible from the Tower Bridge end of Queen's Walk. It moves behind HMS Belfast towards the western edge of the walk.

SEASONAL/NIGHT-TIME VARIATIONS

Seasonal variations do not affect the role of this heritage asset in this view. By night the Monument is brightly lit, drawing the eye to it (see Figure 26).

HERITAGE VALUES OF THE MONUMENT AS HERITAGE ASSET

The Monument is valued as primary evidence of the work of Robert Hooke, scientist, inventor and architect, in collaboration with Wren. Hooke intended the Monument to function as a kind of astronomical observatory (detecting perturbations in the position of stars by sighting through a long vertical hole in the structure) as well as a memorial. Historically the Monument commemorates the Great Fire of London, which destroyed a large part of the city in 1666, and indirectly marks the place where the fire was believed to have started. The Monument continues to embody its original design concept; it is intact, built to a high standard of craftsmanship, with statues and bas-reliefs on its base, and the viewing balcony at the top is open to the public.

SIGNIFICANCE OF THE MONUMENT AS HERITAGE ASSET

The statement of significance summarises the heritage values of this asset as follows:

- the Monument was built as a memorial to the Great Fire of London, close to the place in Pudding Lane where the fire started;
- a collaboration between two significant architects, Wren and Hooke;
- Exhibits in part its the original design concept – the viewing balcony is still open to the public (although the column is no longer an astronomical observatory).

SIGNIFICANCE OF THE MONUMENT IN THIS VIEW

The following are the aspects of the Monument's heritage significance that can be appreciated in the view:

- The prominence of the Monument in the view from the riverside is a reminder of the Great Fire of London in 1666;
- This view reveals the place where the fire started and its relationship to the city of London;
- Provides a distant view of the Monument - an important example of Wren and Hooke's work in London.

STEP 4

ASSESSING THE OVERALL HERITAGE SIGNIFICANCE IN A VIEW

This section sets out the relative contribution of each identified heritage value to the overall value of the view – and highlight those assets that contribute most to overall heritage significance.

This is a view focusing on the Tower of London, an internationally valued asset. It is one of London's iconic views and is a particularly good location from which to view the Tower of London (and particularly the prominent White Tower). The Tower of London contributes most to the overall heritage significance within this view. Tower Bridge also contributes significantly to the heritage value within the view due to its prominent position in the view, which enables many of its heritage values to be appreciated. Although the Monument forms a relatively small component in the view it still contributes to the overall heritage significance within the view as a result of its prominence and the reminder it provides of the Great Fire of London in 1666 (including marking the place where the fire started and its relationship to the city of London). The spires of St Margaret Pattens and St Dunstan in the East contribute least to heritage significance because, although they are reminders of the rebuilding of the City after the Great Fire, they are small components of this view.

The Tower of London and Tower Bridge also benefit from being seen together – the heritage significance within this view is enhanced by the ability to appreciate the Gothic revival architectural detailing of Tower Bridge and its relationship to the neighbouring Tower of London, and the bridge's function as a gateway to the City and Pool of London. The heritage significance within this view is also enhanced by the ability to see the relationship between the spires of St Margaret Pattens and St Dunstan in the East and the Monument – a representation of Wren's post-fire skyline.

STEP 5**IDENTIFY HOW THE SIGNIFICANCE OF HERITAGE CAN BE SUSTAINED**

The significance statements provided above for each asset summarise the values that each asset exhibits in the view. It is important that these values are protected, and where possible enhanced. English Heritage will consider them when evaluating any development proposals that may affect this view.

It is intended that these statements will provide clarity on which aspects of the view English Heritage considers should be sustained. English Heritage and/or the local planning authority will draw on this information to inform their response to proposals for change within views.

English Heritage considers that heritage significance within the view will be sustained if:

- the silhouette, castellations and turrets of the White Tower can continue to be read against an open sky from Assessment point 25A.1;
- the nature, massing and scale of buildings currently seen in this view adjoining the WHS boundary continue to enable the White Tower to maintain prominence in the view by day and by night from the whole Viewing Place;
- new buildings closely surrounding the Tower are of a design and nature that fits with the palette in the view and not in excessively brightly coloured or reflective finishes that could detract from the prominence and architectural complexity of the Tower as seen from the whole Viewing Place;
- the White Tower, and its ring of intact defences, remain prominent from this Viewing Place and continue to reveal the defensive origins of this riverside fortress;
- the Tower's location as the gateway to the City of London can continue to be appreciated from the whole Viewing Place;
- this image of the Tower of London as a romantic castle, including 19th century restorations and its tree planting, can be appreciated from this Viewing Place;
- trees are managed to ensure they frame, rather than obscure, heritage assets in this view – particularly the Tower of London from Assessment point 25A.1;
- St Thomas's Tower and Traitors' Gate can continue to be seen on the riverside below the White Tower from Assessment point 25A.1;
- the ability to appreciate the operation of the elevating roadways from the whole Viewing Place, and against a clear sky from Assessment point 25A.1, is maintained;
- the architectural detailing of the bridge and its relationship with the architectural detailing of the Tower of London remain legible from the whole Viewing Place;
- the ability to recognise and understand the Monument as the place where the Great Fire of London started is maintained in the view from the riverside;
- the ability to see the spires of St Margaret Pattens and St Dunstan in the East (and to appreciate their relationship to the Monument) is maintained in the view from the riverside.

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APPENDIX 2

STATUTORY LIST DESCRIPTIONS

- Emmanuel College Sports Pavilion, including Groundsman's House and stable
- 9 Wilberforce Road



Historic England

Emmanuel College Sports Pavilion, including Groundsman's House and stable

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: Emmanuel College Sports Pavilion, including Groundsman's House and stable

List entry Number: 1422595

Location

Emmanuel College Sports Pavillion, including Groundsman's house and stable, 38 Wilberforce Road, Cambridge

The building may lie within the boundary of more than one authority.

County: Cambridgeshire

District: Cambridge

District Type: District Authority

Parish: Non Civil Parish

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 22-Dec-2014

Date of most recent amendment: Not applicable to this List entry.

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Sports pavilion with attached Groundsman's house and stable, built for Emmanuel College in 1910 to the designs of Reginald Francis Wheatly and Edward Ford Duncanson.

Reasons for Designation

The sports pavilion with attached Groundsman's house and stable, built for Emmanuel College in 1910, is listed at Grade II for the following principal reasons: * Architectural interest: it has a typically vernacular character allowing for an asymmetrical plan that is particularly appropriate for a building encompassing numerous functions which are all brought together into a coherent composition; * Interior: the principal interior space is a finely proportioned room in which the panelled walls, heavily moulded classical joinery, and network of ovolo-moulded ribs create a unified architectural ensemble of considerable quality; * Intactness: it retains many original fixtures and fittings, and although the stable has lost its doors and stalls, its former use remains legible, altogether representing a complete picture of how an Edwardian sports pavilion of this type functioned; * Rarity: there are no comparable listed examples of a pavilion with incorporated Groundsman's house and stabling; * Context: it forms part of an exceptional suburban development in West Cambridge which encompasses the work of some of the most notable architects of the day.

History

Cambridge is situated on the southern edge of the Fens at the highest navigable point of the River Cam. The original Celtic settlement had grown up on the north bank but the Romans established the small town of Durovigutum at the strategically important junction of four major roads. The Saxon occupation spread to the south of the river, and the Normans reaffirmed the strategic importance of the site by building a castle which led to the expansion of the settlement. Cambridge soon became a prosperous town in which several religious houses were established, and these attracted sufficient students for Henry III to recognise the town as a seat of learning in 1231. Most of the fifteen colleges in existence before the Reformation had evolved from the cloistered world of monastic scholarship. Additional colleges and university buildings have continued to be established up to the present day and much new housing was built during the inter-war period and post-war period.

The development of the former medieval West Fields began around 1870. This land, covering approximately 200 acres, was owned primarily by the colleges, notably St John's, which had always strongly resisted any building west of the Backs (the stretch of land which runs along the back of the riverside colleges). It was the loss of college revenue from the agricultural depression that led to their decision to lease the land in building plots. Three new institutions were established – Newnham College in 1875, Ridley Hall in 1877, and Selwyn Hostel (now College) in 1879 – and suburban houses in various styles from Queen Anne to Arts and Crafts and neo-Georgian were built piecemeal over almost half a century. The demand for such large family homes was partly fuelled by a new statute passed in 1882 that finally allowed dons to marry without having to give up their fellowships. The main arteries of development were West Road, Madingley Road and Grange Road which forms the central spine road running north-south through the suburb.

Although economic necessity had forced the colleges to allow building on the land, they were determined to keep a strict control over the residential development which consisted almost entirely of high end middle class housing, interspersed with university playing fields and sports pavilions, without any community facilities such as churches or shops. There was no overall plan but the landowners ensured that it was restricted to an affluent market by issuing leases that specified numerous conditions, including minimum plot sizes, minimum house costs, specification of superior building materials, usually red brick and tiles, and had stringent dilapidation clauses to ensure that property values did not deteriorate. The majority of building leases in West Cambridge and Storey's Way were taken up by individuals who

commissioned either local or London-based architects, many of whom are now considered to be amongst the finest of the late Victorian/ Edwardian age, notably M. H. Baillie Scott who designed nine houses in West Cambridge, E. S. Prior, J. J. Stephenson, and Ernest Newton.

The Sports Pavilion on Wilberforce Road was built in 1910 to the designs of Reginald Francis Wheatly (1879-1959) and Edward Ford Duncanson (1880-?) of 10 Grays Inn. Their plans for the pavilion, attached house and stable were drawn up between March and May 1910 and are preserved in Emmanuel College Archives. Little is known about the architects except that Wheatly is associated with one Grade II listed building – the late C19 Church of St Andrew in Redruth, Cornwall that was completed to his designs in 1937. The ten acre site between Madingley Road and the Coton Footpath was sold by St John's College in 1907 to be laid out as the sports grounds for Emmanuel College. The first Groundsman, William John Masters Manning (1878-1954), had been appointed in 1908 and he resided in the attached Groundsman's House as soon as it was built. The job description stated that the Groundsman would take charge of the ground – consisting of a cricket pitch, two football grounds, a hockey ground and about ten lawn tennis courts – in addition to umpiring at all cricket matches and supplying tea on the ground. His obituary in the 1953/4 College Magazine mentions that 'in his work at the pavilion he was always loyally supported by his first wife'. Manning remained in his post until 1947, having become a College and a City institution for the excellence of his pitches, his sporting prowess and his considerable contribution to the sporting life of Cambridge.

There have been some alterations to the pavilion buildings. Electricity was installed in 1933; one of the bedrooms was partitioned to allow a bathroom to be installed in 1952; and a dangerous balustrade which ran along part of the roof was removed in 1958. The door of the stable and those of the flanking storerooms have been replaced, and the stable fittings removed. Around the beginning of the C21 the south-west wing of the pavilion was extended on the south end to provide shower facilities.

Details

Sports pavilion with attached Groundsman's House and separate stable, built for Emmanuel College in 1910 to the designs of Reginald Francis Wheatly and Edward Ford Duncanson.

MATERIALS: brick covered in roughcast render painted in cream and pale pink

with roof coverings of red plain tiles and bonnet tiles.

PLAN: the pavilion faces north-west over the sports ground and has two angled wings containing changing facilities, one extending eastwards and the other south-westwards. A third range extends south-eastwards from the rear of the pavilion which has a small room for catering that links up to the L-shaped Groundsman's House. On the south side of the south-west wing is a stable with a rectangular plan.

EXTERIOR: the complex roofscape of steep, sweeping pitches gives the building a picturesque character which is tempered by some Classical elements. The main north-west range has a hipped roof with louvred gables and small gabled parapets at each corner, and is surmounted by a decorative copper cupola which has a polygonal base with a raised chevron pattern and a polygonal bell-shaped roof with a weathervane supported by a wooden balustrade. This range has a central triple-leaf, multi-pane glazed door, flanked by similar two-leaf doors, either side of which is a tall twelve-pane fixed window, all with wooden glazing bars. Attached to the front of the range is a flat-roofed loggia with a moulded and dentilled cornice supported by Tuscan columns. The moulded cornice is continued on the flat-roofed angled wings which are lit by top-opening, cross casements with slanting sills. The east wing has a loggia of three round arches with moulded impost bands and three regularly spaced voussoirs of tiles laid on edge (painted cream). It has two windows and a new door to the small shower extension on the end which has been designed in the same style and materials. The south-west wing is divided into five window bays by attached square piers, the recessed windows having pronounced sloping tiled sills. The end wall of the wing is lit by two windows, and the rear elevation by two windows at either end.

The narrow single-storey range linking the pavilion to the house has a pitched roof that continues as a hipped pentice on the rear (west) side of the house, and has a particularly tall red brick ridge stack with raised vertical brick strips around the top. The L-shaped, two-storey house has a pitched roof which sweeps downwards to ground-floor level over the entrance hall on the east (front) side. The roof has plain narrow bargeboards and a moulded wooden cornice that is returned onto the gable ends to form kneelers which have four raised corner bands below. There is a short ridge stack with four tapered tile pots on the north-south aligned roof, and a tall (rebuilt) stack rising from the south slope of the east-west aligned roof, both with vertical brick strips. The east frontage has, on the left, a gabled canopy with a pierced segmental arch supported by shaped brackets over the door with vertical planks and top

glazing. There is a three-light straight-headed dormer in the angle of the roof above. The projecting gabled bay to the right is lit on the ground floor by a six-light casement window with wooden glazing bars and mullions and transoms, with a lintel in the form of a hipped pentice. The first-floor window above is similar but smaller. The right return is lit by two ground-floor cross windows and a small two-light window above. The south gable end is dominated by a flat-roofed canted bay window, and has a six-light window above.

INTERIOR: in contrast to the rather homely vernacular elevations, the interior of the main north-west range is in a handsome Renaissance style. It is a large single space which has canted ends with built-in storage benches, a parquet floor, heavy moulded cornice and a decorative canted ceiling with ovolo-moulded ribs, painted white (as is all the internal joinery). The mid-height panelling has vertical panels and a moulded cornice. The wall opposite the entrance door has a segmental arched recess, flanked by panelled piers, with a heavy moulded cornice supported by paired consoles. The fireplace within the recess retains the original fuel stove set in a semi-circular arched surround of decoratively laid brick with a wooden moulded mantelshelf. This is flanked by four-panelled doors set in moulded doorframes, one leading to the catering room linking up with the house, which retains built-in storage, and the other to a cupboard. The canted ends of the room have arched openings with a moulded segmental arch supported by consoles in the same style as that over the fireplace. These lead through to the changing rooms, one of which retains its original built-in storage benches and rows of clothes hooks, and modern shower facilities.

In contrast, the house has simple fixtures, fittings and joinery, including four-panelled doors with brass knob handles and lock cases, and a dogleg stair with closed string, stick balusters and square capped newel posts. The hall and two reception rooms have parquet floors, and one reception room has a moulded picture rail and simple fireplace surround with dentilled cornice, and the other a coved ceiling cornice and service bell and indicator board with 'front door' and 'back door'. The first floor has three bedrooms, two of which retain simple wooden fireplace surrounds with cast-iron grates, and one a built-in cupboard with panelled doors.

SUBSIDIARY FEATURES: the detached stable has a double-height central bay with a very steeply pitched roof which sweeps down over the flanking single-storey tile-hung storage bays that are recessed on the west frontage. The large opening to the stable has lost its original door, and the doors and

windows to the store rooms have been replaced. The gable head projects over the hay loft hatch and is supported by wooden brackets. The rear (east) side has a series of wooden brackets, presumably for holding grass-cutting equipment as they are protected by a pentice roof. There is a bottom-opening window just above this roof. Internally, the stable retains the floor of the hay loft with an opening for access but none of the internal stable fittings survive.

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National Grid Reference: TL4352258697

Map



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Historic England

9, WILBERFORCE ROAD

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: 9, WILBERFORCE ROAD

List entry Number: 1268352

Location

9, WILBERFORCE ROAD

The building may lie within the boundary of more than one authority.

County: Cambridgeshire

District: Cambridge

District Type: District Authority

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 02-Aug-1996

Date of most recent amendment: Not applicable to this List entry.

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 461923

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

TL 45 NW CAMBRIDGE WILBERFORCE ROAD (East side) 667/20/10079 No.9

II

House. 1937 by D. Cosens. Whitewashed brick laid in Flemish bond; bituminous felt roof Modern Movement. 2 storeys and roof patio. Rectangular plan with a recessed corner section at south-east corner. Entrance front to west is a 3-window range. Glazed Crittall door set left of centre beneath projecting flat porch hood which extends over garage to left. One S-light and one 2-light Crittall windows to right. 2 5-light and one 2-light Crittall windows to first floor. Flat roof with plain parapet. Roof patio consists of a single room

with wrap-around Crittall windows over which projects a flat canopy roof supported on circular-section iron posts. South and east elevations with Crittall windows of various dispositions including 6- and 5-light casements wrapping round the south-east external angle. First-floor balcony to south elevation, reached via a 4-light Crittall French window. INTERIOR. Plain staircase with boarded balustrade. Kitchen fittings intact.

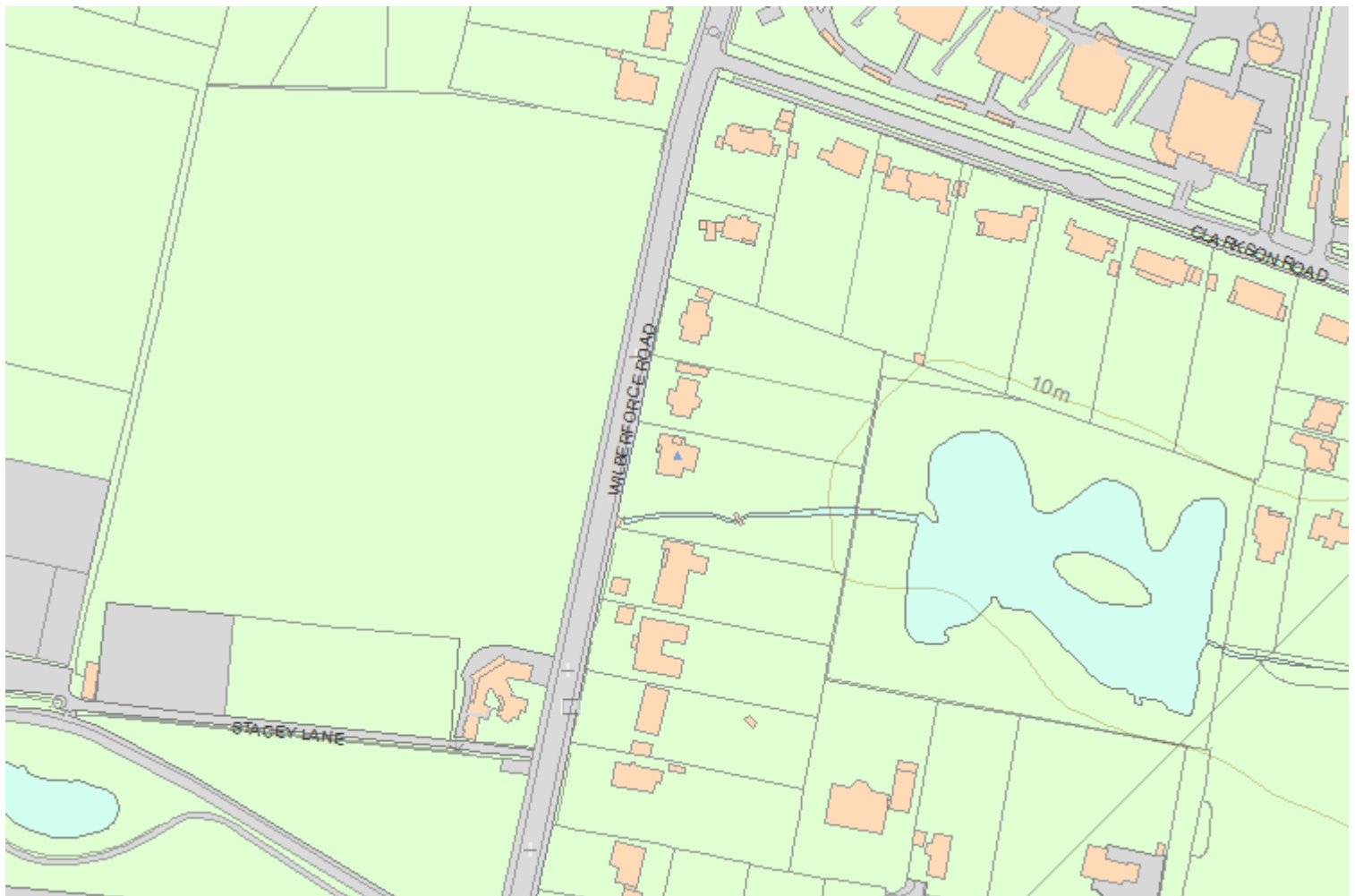
Listing NGR: TL4358858783

Selected Sources

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: TL 43588 58783

Map



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APPENDIX 3

SETTING ASSESSMENTS

- Emmanuel College Sports Pavilion
- 9 Wilberforce Road
- 19 Wilberforce Road
- 6-11 Bulstrode Gardens
- 4-5 Hedgerley Close

EMMANUEL COLLEGE SPORTS PAVILION

PHYSICAL SURROUNDINGS OF THE SPORTS PAVILION	
Topography	The Emmanuel College Sports Pavilion is located within a relatively flat plateau of land, to the west of the River Cam.
Other Assets (including buildings, structures, landscapes, areas or archaeological remains)	The Pavilion is attached to the Groundsman's House and stable (included within the list entry), which form an integral part of the building. The adjacent sport grounds, and the railings which bound the site, form part of the understanding and functionality of the site. There is a Grade II listed property to the north-east (9 Wilberforce Road) and a non-designated property to the south-east (19 Wilberforce Road).
Definition, scale and grain of surrounding streetscape, landscape and spaces	The development around the site is predominantly loose in grain and consists of detached properties set within their own plots. Buildings are generally 2 storeys in height and are residential in scale. There are some examples of larger scale University buildings to the north, which add a variety and interest to the built form.
Formal design	The main formal element of design to the building is the western elevation of the pavilion which faces onto the Emmanuel College Sports Ground. Behind this the Groundsman's house faces onto the Wilberforce Road.
Historic materials and surfaces	The building is rendered with a tiled roof. Adjacent buildings are also rendered with a mixture of slate and tile roof coverings. Immediately adjacent the Pavilion is the grassed Sports Ground with modern tarmacadam used the road surfaces.
Land uses	The surrounding land use is that of residential and recreational with some educational uses also present.
Green space, trees and vegetation	The land to the north-west of the Pavilion is an open area – used for sporting activities including cricket. Beyond these sport grounds are 20 th and 21 st century residential houses. To the south of the Pavilion is the University Sports Ground with open countryside beyond that. To the east of the property is further residential built form. There are a number of a matures trees and hedges seen within property boundaries which, when coupled with the set back of the built form from the main road, create a more suburban atmosphere.
Openness, enclosure and boundaries	The building has an open sense due to the adjacent sport grounds. This sense of openness is also maintained along the streetscape due to the positioning of the adjacent built form back within their plots.
Functional relationships	The site has a clear functional relationship with the Emmanuel College and Gonville & Caius Sports Grounds.

History and degree of change over time	The site has changed little over time in terms of its continued use as a Sports Pavilion associated with Emmanuel College Sports Ground.
Integrity	The building still retains its integrity as an early 20 th century Sports Pavilion.

EXPERIENCE OF ASSET – SPORTS PAVILION	
Surrounding landscape or townscape character	The immediate surrounding landscape is formed by a mixture of residential properties and open land. The set back of the properties within their own established plots creates a suburban atmosphere.
Views from, towards, through, across and including the asset	Views of the building are seen along Wilberforce Road as well as from within the Emmanuel College and Gonville & Caius Sports Grounds. Due to its location to the south of the ground, wide views of the building, shown within the context of the Emmanuel College Sports Ground, are mainly found when looking southwards along Wilberforce Road. Views northwards are more channelled by the Pavilion building itself and the adjacent mature vegetation.
Visual dominance, prominence or role as focal point	The Pavilion and attached Groundsman's House has a visual presence from within the Emmanuel College Sports Ground, as well as along the streetscape.
Intentional intervisibility with other historic and natural features	There does not appear to be any intentional visual linkage with adjacent historic buildings. Although there is a clear link with the adjacent Sports Ground.
Noise, vibration and other pollutants or nuisances	As a result of the adjacent Wilberforce Road noise from vehicles is evident. Noise from the use of the site for sports purposes but this is considered to be a positive contribution to the building.
Tranquillity, remoteness, 'wildness'	The building does not portray a sense of remoteness due to its location within a residential area. However, the open space does create a separation between these uses which results in an atmosphere of tranquillity.
Sense of enclosure, seclusion, intimacy or privacy	There is a lack of intimacy or enclosure due to the location within the Emmanuel College Sports Ground. The positioning of the principal elevation westwards with built form of the Groundman's House behind does provide a level of privacy.
Dynamism and activity	The adjacent site is used as a sports ground and as such there is a clear movement of people around the site.
Accessibility, permeability and patterns of movement	Access to the building and sports grounds is for private use and as such there is limited accessibility for the public.
Degree of interpretation or promotion to the public	The building can be seen from public vantage points along the main road which allows the building to be appreciated by the public.

The rarity of comparable survivals of setting	The Pavilion is an unusual example of an early 20 th century Pavilion with attached Groundman's House and stables. Its continued placement within an area of open space therefore adds to the significance of the building.
The asset's associative attributes	Emmanuel College and Gonville & Caius College.
Associative relationships between heritage assets	There is also a clear association with the sport grounds
Cultural associations	No significant cultural associations.
Celebrated artistic representations	N/A
Traditions	N/A

9 WILBERFORCE ROAD

PHYSICAL SURROUNDINGS OF 9 WILBERFORCE ROAD	
Topography	9 Wilberforce Road is located within a relatively flat plateau of land, west of the River Cam.
Other Assets (including buildings, structures, landscapes, areas or archaeological remains)	9 Wilberforce Road does not appear to have any clear associative assets other than the Emmanuel College Sports Pavilion and Grounds.
Definition, scale and grain of surrounding streetscape, landscape and spaces	To the direct west of the site is the Emmanuel College and Gonville & Caius Sports Grounds which forms an open edge to the plot. To the rear (east) there is a wooded area and pond. The built form to the north and south of the plot has a fairly loose in grain and consists of detached properties set within their own plots. Buildings are generally 2 storeys in height and are residential in scale. There are also some examples of larger scale University buildings to the north.
Formal design	The main façade of the building is orientated west towards Wilberforce Road. This appears to have been designed as a response to the layout of the road rather than a formal design.
Historic materials and surfaces	The building is rendered with a bituminous roof. Adjacent buildings are also rendered with a mixture of slate and tile roof coverings. Immediately opposite the building in the west is the grassed sport grounds, with modern tarmac seen for the road surfaces, whilst to the east is a wooded area.
Land uses	The surrounding land use is that of residential and recreational with some educational uses also seen.
Green space, trees and vegetation	The land to the west is an open area – used for sporting activities including cricket. Beyond these sport grounds are 20 th and 21 st century residential houses. To the north and south of the building are residential properties. To the immediate east is a small wooded area surrounded by further residential houses. There are a number of a matures trees and hedges seen within the adjacent property boundaries which, when coupled with the set back of the built form from the main road, create a more suburban atmosphere.
Openness, enclosure and boundaries	The site is fairly enclosed as a result of the mature vegetation to all boundaries.
Functional relationships	The building does not appear to have any functional relationships other than within its own site.
History and degree of change over time	The site has changed little over time and remains intact.
Integrity	The site overall has retained a good level of integrity.

EXPERIENCE OF ASSET – 9 WILBERFORCE ROAD	
Surrounding landscape or townscape character	The immediate surrounding landscape is formed by a mixture of residential properties, open land and a small wooded area to the east. The set back of the properties within their own established plots creates a suburban atmosphere.
Views from, towards, through, across and including the asset	Views of the building are seen both north and south along Wilberforce Road as well as eastwards from within the sport grounds of Emmanuel College and Gonville & Caius College.
Visual dominance, prominence or role as focal point	Due to the positioning of the building and the existing mature vegetation, the building has a reduced visual presence along the streetscape.
Intentional intervisibility with other historic and natural features	There does not appear to be any visual connection with adjacent historic buildings although there is an intervisibility with the adjacent Sports Ground.
Noise, vibration and other pollutants or nuisances	There is a level of vehicular and pedestrian movement along the main road with movement and noise from the adjacent sport grounds also present.
Tranquillity, remoteness, 'wildness'	The building is enclosed by its mature vegetation which gives the site a small sense of tranquillity although its overall positioning, adjacent Wilberforce Road, results in the site not being considered tranquil in its context.
Sense of enclosure, seclusion, intimacy or privacy	The building is enclosed to a degree by the existing mature vegetation within its plot which creates a sense of privacy.
Dynamism and activity	The site is used for residential purposes and activities.
Accessibility, permeability and patterns of movement	N/A
Degree of interpretation or promotion to the public	The building can be seen from public vantage points along the main road which allows the building to be appreciated by the public.
The rarity of comparable survivals of setting	This is a good example of a building, of this date, in this area.
The asset's associative attributes	N/A
Associative relationships between heritage assets	N/A
Cultural associations	N/A
Celebrated artistic representations	N/A
Traditions	N/A

19 WILBERFORCE ROAD

PHYSICAL SURROUNDINGS 19 WILBERFORCE ROAD	
Topography	19 Wilberforce Road is located on a relatively flat plateau of land, west of the River Cam.
Other Assets (including buildings, structures, landscapes, areas or archaeological remains)	There are two designated heritage assets within the vicinity of the building; the Pavilion and 9 Wilberforce Road (both Grade II listed).
Definition, scale and grain of surrounding streetscape, landscape and spaces	The surrounding grain of the streetscape is fairly loose. Properties are of a residential scale and are predominantly two storeys in height.
Formal design	The main façade of the building is orientated west towards Wilberforce Road. This appears to have been designed as a response to the layout of the road rather than a formal design.
Historic materials and surfaces	The adjacent buildings are constructed in render with slate, tile or bitumen felt roofs.
Land uses	The main use around the site is residential, although there are sport grounds seen to the east.
Green space, trees and vegetation	The building sits within its own established garden with open sports grounds to the west.
Openness, enclosure and boundaries	The site is fairly enclosed as a result of the mature vegetation to all boundaries.
Functional relationships	The building does not appear to have any functional relationships beyond its own plot.
History and degree of change over time	The building dates to the 20 th century, as do the majority of the surrounding built form. The building has been altered overtime the site remains fairly intact
Integrity	The site overall has retained a moderate level of integrity.

EXPERIENCE OF ASSET 19 WILBERFORCE ROAD	
Surrounding landscape or townscape character	The surrounding landscape is one of a residential nature with elements of recreational and educational also seen. The mature vegetation adds significantly to the appearance and character of the streetscape.
Views from, towards, through, across and including the asset	The main views of the building are found along Wilberforce Road, although this is where gaps in the existing vegetation allow glimpses of the building. This mature vegetation curtails views across and through the site.

Visual dominance, prominence or role as focal point	Due to the positioning of the building and the existing mature vegetation, the building has a limited visual presence along the streetscape.
Intentional intervisibility with other historic and natural features	There is some intervisibility with the adjacent Sports Ground but this is limited due to the mature vegetation seen on site.
Noise, vibration and other pollutants or nuisances	There is a level of vehicular and pedestrian movement along the main road.
Tranquillity, remoteness, 'wildness'	The building is enclosed by its mature vegetation which gives the site a sense of tranquillity although its overall positioning, adjacent to the main road, results in the site not being considered tranquil in its context.
Sense of enclosure, seclusion, intimacy or privacy	The building is enclosed by mature vegetation which creates a sense of privacy.
Dynamism and activity	The building is used for residential purposes.
Accessibility, permeability and patterns of movement	N/A
Degree of interpretation or promotion to the public	The property is visible from some public locations however, due to the mature vegetation, this is limited.
The rarity of comparable survivals of setting	This is a modest example of a building, of this date, in this area.
The asset's associative attributes	N/A
Associative relationships between heritage assets	N/A.
Cultural associations	N/A
Celebrated artistic representations	N/A
Traditions	N/A

6-11 BULSTRODE GARDENS

PHYSICAL SURROUNDINGS OF 6-11 BULSTRODE GARDENS	
Topography	Bulstrode Gardens is located within an area of flat land west of the River Cam.
Other Assets (including buildings, structures, landscapes, areas or archaeological remains)	6-11 Bulstrode Gardens are non-designated assets, which are associated with other properties in Bulstrode Gardens.
Definition, scale and grain of surrounding streetscape, landscape and spaces	The development around the site is loosely grained and is predominantly formed by 20 th century buildings although there are also some historic properties in the vicinity. Buildings are generally large 2 storey detached houses set in large gardens. The exceptions to this are the University of Cambridge Department of Applied Mathematics and Theoretical Physics, and the Computer and Cavendish Laboratories to the west.
Formal design	Bulstrode Gardens has been laid out and developed as one development.
Historic materials and surfaces	The buildings are of brick and tile construction.
Land uses	The immediate use of the buildings is residential. In the wider area there are educational and research uses.
Green space, trees and vegetation	The buildings are set within large gardens. To the south of the site lies the Emmanuel College Sports Grounds, and to the north lies Churchill College and its grounds.
Openness, enclosure and boundaries	The site itself feels enclosed due to the number of buildings within the close, however the sense of openness increases in the surrounding area.
Functional relationships	There are no functional relationships beyond their individual plots.
History and degree of change over time	Bulstrode Gardens was constructed in the 20 th century and there has been little change in the immediate area although new development has taken place to the west.
Integrity	The building group retains its integrity as a 20 th century planned development.

EXPERIENCE OF ASSET – 6-11 BULSTRODE GARDENS	
Surrounding landscape or townscape character	The immediate surrounding landscape is formed by residential properties, with educational and research uses in the wider area.
Views from, towards, through, across and including the asset	Bulstrode Gardens is a private road and views cannot be achieved down the length of the road. The gardens of 6-8 Bulstrode Gardens back onto the application site.

Visual dominance, prominence or role as focal point	The buildings are large detached dwellings and as such have a strong visual presence within the cul-de-sac.
Intentional intervisibility with other historic and natural features	There does not appear to be any intentional visual linkage with adjacent buildings.
Noise, vibration and other pollutants or nuisances	N/A
Tranquillity, remoteness, 'wildness'	Bulstrode Gardens is set within a quiet residential area, though it is accessed from a main road into Cambridge, the A1303 (Madingley Road).
Sense of enclosure, seclusion, intimacy or privacy	The buildings are set back from the street in large gardens. The surrounding buildings give some sense of enclosure but the development is of an open grain.
Dynamism and activity	Bulstrode Gardens is a private cul-de-sac and as such there is limited activity at the site.
Accessibility, permeability and patterns of movement	Due to Bulstrode Gardens being a private road, accessibility is limited.
Degree of interpretation or promotion to the public	Due to Bulstrode Gardens being a private road, the building's appreciation is limited to residents.
The rarity of comparable survivals of setting	Bulstrode Gardens is not a particularly unusual example of a planned 20 th century development.
The asset's associative attributes	There are no associative attributes.
Associative relationships between heritage assets	There is also a clear association with the other buildings in the cul-de-sac.
Cultural associations	No significant cultural associations.
Celebrated artistic representations	N/A
Traditions	N/A

4-5 HEDGERLEY CLOSE

PHYSICAL SURROUNDINGS OF 4-5 HEDGERLEY CLOSE	
Topography	Hedgerley Close is located within an area of flat land west of the River Cam.
Other Assets (including buildings, structures, landscapes, areas or archaeological remains)	4-5 Hedgerley Close are non-designated assets, which are associated with other properties in Hedgerley Close.
Definition, scale and grain of surrounding streetscape, landscape and spaces	The development around the site is loosely grained and is predominantly formed by 20 th century buildings although there are also some historic properties in the vicinity. Buildings are generally large 2 storey detached houses set in large gardens. The exceptions to this are the University of Cambridge Department of Applied Mathematics and Theoretical Physics, and the Computer and Cavendish Laboratories to the west.
Formal design	Hedgerley Close has been laid out and developed as one development.
Historic materials and surfaces	The buildings are of render and tile construction.
Land uses	The immediate use of the buildings is residential. In the wider area there are educational and research uses.
Green space, trees and vegetation	The buildings are set within large gardens. To the south lies the Gonville & Caius College Sports Grounds, and to the north lies Churchill College and its grounds.
Openness, enclosure and boundaries	The site itself feels enclosed due to the number of buildings within the close, however the sense of openness increases in the surrounding area.
Functional relationships	There are no functional relationships beyond the individual plots.
History and degree of change over time	Hedgerley Close was constructed in the 20 th century and there has been little change in the immediate area although new development has taken place to the west.
Integrity	The building group retains its integrity as a 20 th century planned development.

EXPERIENCE OF ASSET – 4-5 HEDGERLEY CLOSE	
Surrounding landscape or townscape character	The immediate surrounding landscape is formed by residential properties, with educational and research uses in the wider area.
Views from, towards, through, across and including the asset	Hedgerley Close is a cul-de-sac and views cannot be achieved down the length of the road. The properties to the rear of 4-5 Hedgerley Close back onto the application site.

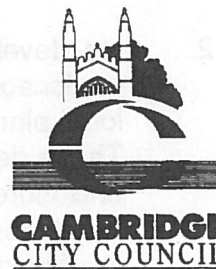
Visual dominance, prominence or role as focal point	The building are large detached dwellings and as such have a strong visual presence within the cul-de-sac.
Intentional intervisibility with other historic and natural features	There does not appear to be any intentional visual linkage with adjacent buildings.
Noise, vibration and other pollutants or nuisances	N/A
Tranquillity, remoteness, 'wildness'	Hedgerley Close is set within a quiet residential area, though it is accessed from a main road into Cambridge, the A1303 (Madingley Road).
Sense of enclosure, seclusion, intimacy or privacy	The buildings are set back from the street in large gardens. The surrounding buildings give some sense of enclosure but the development is of an open grain.
Dynamism and activity	As Hedgerley Close is not a through route there is limited activity at the site.
Accessibility, permeability and patterns of movement	Hedgerley Close is accessible by car and on foot, though there is no through route.
Degree of interpretation or promotion to the public	Due to Hedgerley Close not having a through route, there is limited appreciation of the buildings by the public.
The rarity of comparable survivals of setting	Hedgerley Close is not a particularly unusual example of a planned 20 th century development.
The asset's associative attributes	There are no associative attributes.
Associative relationships between heritage assets	There is also a clear association with the other buildings in the cul-de-sac.
Cultural associations	No significant cultural associations.
Celebrated artistic representations	N/A
Traditions	N/A



BIDWELLS

APPENDIX D
PLAYING FIELD, LONG ROAD

AP129413



CAMBRIDGE CITY COUNCIL

The Guildhall, Cambridge, CB2 3QJ

TOWN AND COUNTRY PLANNING ACTS 1990

FULL PLANNING PERMISSION

SUBJECT TO CONDITIONS

Ref: **08/0873/FUL**

Bidwells
Mrs Liz Beighton
Trumpington Road
Cambridge
CB2 2LD

ENTERED IN LAND CHARGES REGISTER
INITIALS: <u>SH</u>
DATE: <u>20/8/2008</u>

The Council hereby grant full planning permission for

Change of use of agricultural land to playing field.

at

Land Adjacent Rutherford Road Long Road Cambridge Cambridgeshire

in accordance with your application received 20th June 2008 and the plans, drawings and documents which form part of the application, subject to the conditions set out below:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with the requirements of section 51 of the Planning and Compulsory Purchase Act 2004.

Simon Payne
Director of Environment & Planning
Cambridge City Council The Guildhall Cambridge CB2 3QJ
Telephone 01223 457000 Minicom (non-speaking phone) 01223 457050



INVESTOR IN PEOPLE

2. No development shall take place until full details of both hard and soft landscape works have been submitted to and approved in writing by the local planning authority and these works shall be carried out as approved. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts, other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (eg furniture, play equipment, refuse or other storage units, signs, lighting); proposed and existing functional services above and below ground (eg drainage, power, communications cables, pipelines indicating lines, manholes, supports); retained historic landscape features and proposals for restoration, where relevant. Soft Landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate and an implementation programme.

Reason: In the interests of visual amenity and to ensure that suitable hard and soft landscape is provided as part of the development. (East of England Plan 2008 policy ENV7 and Cambridge Local Plan 2006 policies 3/4, 3/11 and 3/12)

3. No development shall take place until there has been submitted to and approved in writing by the local planning authority a plan indicating the positions, design, materials and type of boundary treatments to be erected. The boundary treatment shall be completed before the use hereby permitted is commenced and retained thereafter unless any variation is agreed in writing by the local planning authority. Development shall be carried out in accordance with the approved details.

Reason: To ensure an appropriate boundary treatment is implemented. (East of England Plan 2008 policy ENV7 and Cambridge Local Plan 2006 policies 3/4, 3/11 and 3/12)

4. Before the site is first used as a playing field, the access shall be implemented in accordance with the requirements of the local planning authority.

Reason: In the interests of highway safety (Cambridge Local Plan 2006, policy 8/2).

5. No floodlighting or public address system may be introduced to the site without the prior written agreement of the local planning authority

Reason: In the interests of residential amenity (Cambridge Local Plan 2006, policy 3/4).

6. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking or re-enacting that Order with or without modification), the site may be used for no use (including any temporary use) other than as a playing field without prior written agreement of the local planning authority.

Reason: In the interests of residential amenity (Cambridge Local Plan 2006, policy 3/4).

7. No spoil or materials shall be deposited or stored in the floodplain nor is any ground rising allowed within the floodplain as shown on the Agency flood maps unless expressly authorised in writing by the local planning authority.

Reason: To prevent the increased risk of flooding due to impedance of flood flows and reduction of food storage capacity.

Reasons for Approval

1. This development has been approved, conditionally, because subject to those requirements it is considered to generally conform to the Development Plan, particularly the following policies:

East of England plan 2008: SS1, SS7

Cambridge Local Plan (2006): 3/1, 3/4, 4/1, 6/2, 8/2, 8/6, 8/10

2. The decision has been made having had regard to all other material planning considerations, none of which was considered to have been of such significance as to justify doing other than grant planning permission.

These reasons for approval can be a summary of the reasons for grant of planning permission only. For further detail on the decision please see the officer report by visiting the Council Planning Department.

This decision notice relates to the following drawings: **A.33,255.**

It is important the development is carried out fully in accordance with these plans. If you are an agent, please ensure that your client has a copy of them and that they are also passed to the contractor carrying out the development. A copy of the approved plan(s) is/are kept on the planning application file.

It is important that all conditions particularly pre-commencement conditions are fully complied with, and where appropriate, discharged prior to the implementation of the development. Failure to discharge such conditions may invalidate the planning permission granted. The development must be carried out fully in accordance with the requirements of any details approved by condition.

This decision notice does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than Section 57 of the Town and Country Planning Act 1990.

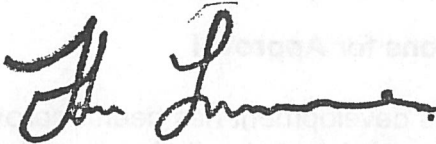
Your attention is specifically drawn to the requirements of the Chronically Sick and Disabled Persons Act 1970, the Disabled Persons Act 1981, to the British Standards Institution Code of Practice for Access for the Disabled to Buildings (BS 5810 1979), to Part M of the Building Regulations 1991, and to BS 5588 Part 8

1988 (Code of Practice for means of escape for disabled persons). The development should comply with these requirements.

Please note: On-street parking controls, including residents' parking schemes, are in operation in several parts of the City of Cambridge. There are restrictions on eligibility for residents' parking permits, even for residents within the areas covered by schemes. Implementing a planning consent can remove eligibility for a permit. The City Council can advise whether or not properties qualify for a Residents' Parking Permit. If in doubt, please check with us, mentioning this planning consent. Please also be aware that the criteria for granting parking permits may change from time to time.

Dated: 18 August 2008

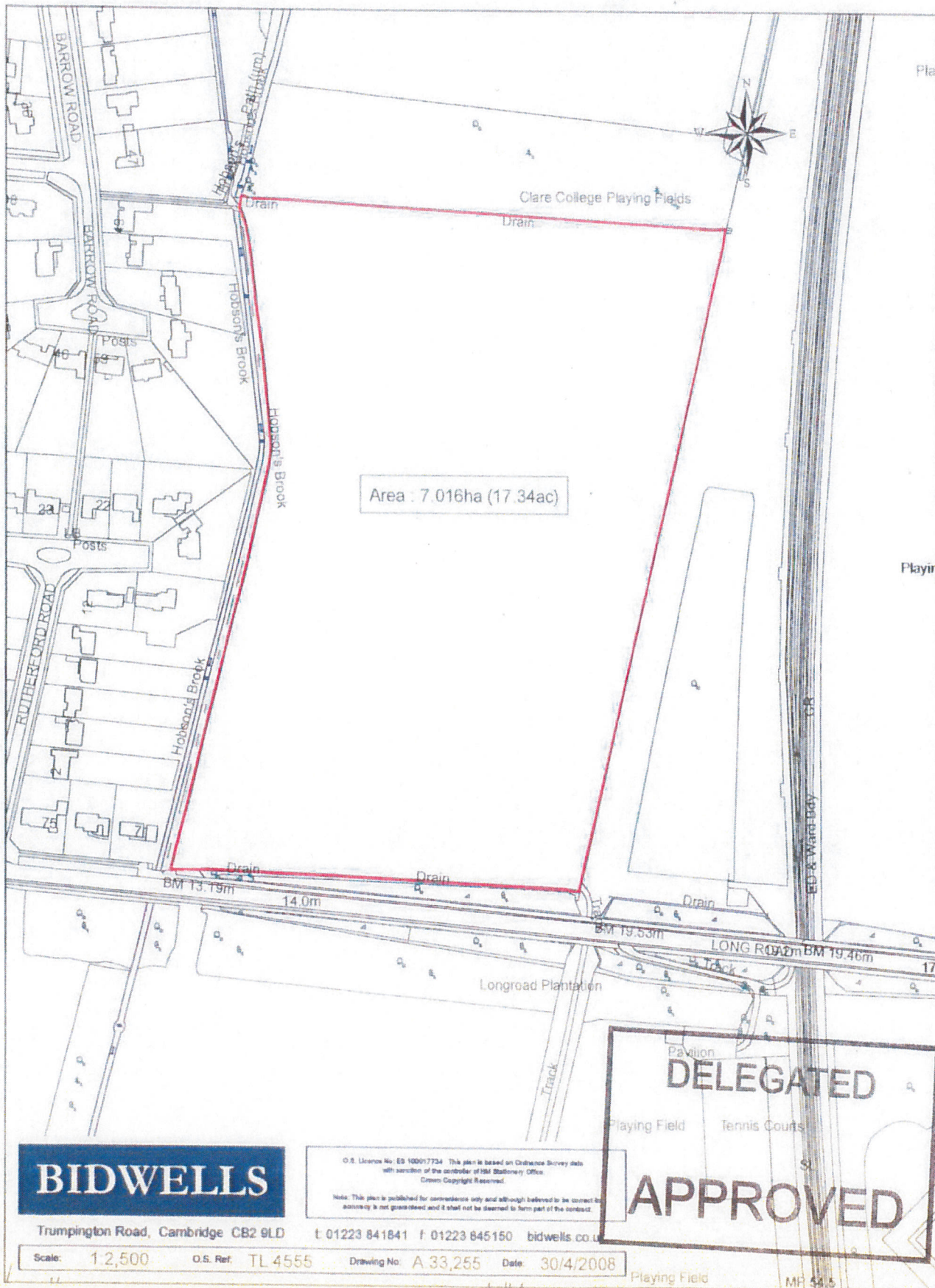
Guildhall, Cambridge, CB2 3QJ


Director of Environment & Planning
PP *allu*

SEE NOTES OVERLEAF

08 / 0873 / FUL

Land adjacent to Rutherford Road and Long Road Cambridge



BIDWELLS

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Note: This plan is published for convenience only and although believed to be correct in accuracy is not guaranteed and shall not be deemed to form part of the contract.

Trumpington Road, Cambridge CB2 9LD t: 01223 841841 f: 01223 845150 bidwells.co.uk

Scale: 1:2,500 O.S. Ref: TL 4555 Drawing No. A 33,255 Date: 30/4/2008

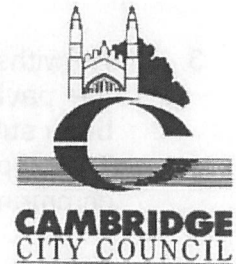
APPENDIX E

SPORTS PAVILION, LONG ROAD

CAMBRIDGE CITY COUNCIL

The Guildhall, Cambridge, CB2 3QJ

TOWN AND COUNTRY PLANNING ACT 1990



APPROVAL OF RESERVED MATTERS

SUBJECT TO CONDITIONS

Ref: 11/0818/REM

Mr. Guy Kaddish
Bidwells
Bidwell House
Trumpington Road
Cambridge
CB2 9LD

The Council hereby grant approval of reserved matters for

Erection of Sports Pavilion, machinery store and car park.

at

Land Adjacent Rutherford Road Long Road Cambridge Cambridgeshire

in accordance with your application received 12th July 2011 and the plans, drawings and documents which form part of the application, subject to the conditions set out below:

1. Construction of the pavilion building hereby permitted shall not commence until full details of the entrances, demonstrating accessibility for all users, have been submitted to, and approved in writing by, the local planning authority.

Reason: To ensure accessibility for all users. (Cambridge Local Plan 2006 policy 3/7)

2. No use of the pavilion shall commence until full details of the arrangements for the storage and collection of waste and recycling have been submitted to the local planning authority, approved in writing, and installed in accordance with the approved details.

Reason: To ensure appropriate waste storage. (Cambridge Local Plan 2006 policy 3/12)



3. Notwithstanding the details shown on the application drawings, no use of the pavilion shall take place until revised details of cycle storage have been submitted to and approved in writing by the local planning authority. The approved revised arrangements shall be put in place before use commences, and maintained thereafter.

Reason: To ensure appropriate cycle parking. (Cambridge Local Plan 2006 policies 3/12 and 8/6)

4. Before the development hereby permitted is occupied, a scheme for the insulation of the building(s) and/or plant in order to minimise the level of noise emanating from the said building(s) and/or plant shall be submitted to and approved in writing by the local planning authority and the scheme as approved shall be fully implemented before the use hereby permitted is commenced.

Reason: To protect the amenity of neighbouring occupiers. (Cambridge Local Plan 2006 policies 3/4 and 4/13)

5. No use of the pavilion shall commence until details of external lighting have been submitted to, and approved in writing by, the local planning authority. The lighting impact shall be assessed in accordance with The Institute of Lighting Professionals" Guidance Notes for the Reduction of Obtrusive Light GN01:2011. Lighting shall thereafter be installed only in accordance with the approved details.

Reason: To avoid light pollution (Cambridge Local Plan 2006 policy 4/13)

6. Notwithstanding the landscape drawings submitted, use of the pavilion shall not commence until detailed planting plans, written plant specifications, schedule of planting and implementation plan for landscaping have been submitted and approved in writing by the local planning authority. Landscaping shall be carried out in accordance with the approved details.

Reason: To ensure appropriately designed exterior spaces. (Cambridge Local Plan 2006 policy 3/11)

7. The pavilion hereby approved shall not be brought into use until a schedule of landscape maintenance for a minimum period of five years has been submitted to and approved in writing by the local planning authority. The schedule shall include details of the arrangements for its implementation.

Reason: To ensure that the landscaped areas are maintained in a healthy condition in the interests of visual amenity. (East of England Plan 2008 policy ENV7 and Cambridge Local Plan 2006 policies 3/4, 3/11 and 3/12)

8. A landscape management plan, including long term design objectives, management responsibilities and maintenance schedules, shall be submitted to and approved by the local planning authority in writing prior to the pavilion being brought into use. The management plan shall be carried out as approved.

Reason: In the interests of visual amenity and to ensure that suitable hard and soft landscape is provided as part of the development. (East of England Plan 2008 policy ENV7 and Cambridge Local Plan 2006 policies 3/4, 3/11 and 3/12)

9. Notwithstanding the details submitted, hedging and fencing on the western, southern, and eastern boundaries of the sports field shall not be erected until details of a revised design for such hedging and fencing has been submitted to, and approved in writing by, the local planning authority.

Reason: To protect the openness of the Green Belt and the character of the area. (Cambridge Local Plan policies 3/4, 4/1 and 4/2)

10. Notwithstanding the details submitted, the approved pavilion shall not be brought into use until full details (layout plan and cross-section) of the measures to prevent car parking on the field have been submitted to, and approved in writing by, the local planning authority, and the approved details have been implemented. The approved measures shall remain in place thereafter.

Reason: To protect the openness of the Green Belt and the character of the area. (Cambridge Local Plan policies 3/4, 4/1 and 4/2)

11. No development shall take place until full design details and construction methodology for the access road to the guided busway, and details of the segregation of this access from the sports field, have been submitted to and approved in writing by the local planning authority. The access road shall be constructed in accordance with the approved design details and methodology before any use of the pavilion begins.

Reason: To ensure satisfactory access to the Guided Busway. (Cambridge Local Plan 2006 policy 8/8)

12. To satisfy the condition regarding noise insulation, the noise level from all plant and equipment, vents etc (collectively) associated with this application should not raise the existing background level (L90) by more than 3 dB(A) (i.e. the rating level of the plant needs to match the existing background level). This requirement applies both during the day (0700 to 2300 hrs over any one hour period) and night time (2300 to 0700 hrs over any one 5 minute period), at the boundary of the premises subject to this application and having regard to noise sensitive premises. Tonal/impulsive noise frequencies should be eliminated or at least considered in any assessment and should carry an additional 5 dB(A) correction. This is to guard against any creeping background noise in the area and prevent unreasonable noise disturbance to other premises.

It is recommended that the agent/applicant submits a noise prediction survey/report in accordance with the principles of BS4142: 1997 "Method for rating industrial noise affecting mixed residential and industrial areas" or similar. Noise levels shall be predicted at the boundary having regard to neighbouring residential premises.

Such a survey / report should include: a large scale plan of the site in relation to neighbouring premises; noise sources and measurement / prediction points marked on plan; a list of noise sources; details of proposed noise sources / type of plant such as: number, location, sound power levels, noise frequency spectrums, noise directionality of plant, noise levels from duct intake or discharge points; details of noise mitigation measures (attenuation details of any intended enclosures, silencers or barriers); description of full noise calculation procedures; noise levels at a representative sample of noise sensitive locations and hours of operation.

Any report shall include raw measurement data so that conclusions may be thoroughly evaluated and calculations checked.

Reasons for Approval

1. This development has been approved, conditionally, because subject to those requirements it is considered to conform to the Development Plan as a whole, particularly the following policies:

East of England plan 2008: policies SS1, SS7, T9, T14, ENV2, ENV7, WAT4;

Cambridge Local Plan (2006): policies 3/1, 3/2, 3/3, 3/4, 3/7, 3/9, 3/11, 3/12, 4/1,4/2, 4/3, 4/4, 4/6, 4/8, 4/13, 4/15, 4/16, 6/2, 8/2, 8/5, 8/6, 8/8, 8/10, and 8/18;

2. The decision has been made having had regard to all other material planning considerations, none of which was considered to have been of such significance as to justify doing other than grant planning permission.

These reasons for approval can be a summary of the reasons for grant of planning permission only. For further details on the decision please see the officer report online at www.cambridge.gov.uk/planningpublicaccess or visit our Customer Service Centre, Mandela House, 4 Regent Street, Cambridge, CB2 1BY between 8am to 6pm Monday to Friday.

This decision notice relates to the following drawings:
S101000029-02C, A005 REV D and A003 REV C.

It is important the development is carried out fully in accordance with these plans. If you are an agent, please ensure that your client has a copy of them and that they are also passed to the contractor carrying out the development. A copy of the approved plans are kept on the planning application file.

It is important that all conditions particularly pre-commencement conditions are fully complied with, and where appropriate, discharged prior to the implementation of the development. Failure to discharge such conditions may invalidate the planning permission granted. The development must be carried out fully in accordance with the requirements of any details approved by condition.

This decision notice does not convey any approval or consent which may be required under any enactment, bye-law, order or regulation other than Section 57 of the Town and Country Planning Act 1990.

Your attention is specifically drawn to the requirements of the Chronically Sick and Disabled Persons Act 1970, the Disabled Persons Act 1981, to the British Standards Institution Code of Practice for Access for the Disabled to Buildings (BS 5810 1979), to Part M of the Building Regulations 1991, and to BS 5588 Part 8 1988 (Code of Practice for means of escape for disabled persons). The development should comply with these requirements.

For further information please go to www.cambridge.gov.uk/planning.

Dated: 21 November 2012

P. Dew

Guildhall, Cambridge, CB2 3QJ

Head of Planning Services *W*

SEE NOTES ATTACHED



PLANNING PERMISSION

1. Appeals to the Secretary of State

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development' or to grant permission subject to conditions, then you can appeal to the First Secretary of State under section 78 of the Town & Country Planning Act 1990.

If you want to appeal then you must do so within 6 months of the date of this notice or within 12 weeks of the date of the decision notice against a refusal of any householder planning application that was valid on or after 6th April 2009, using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or from www.planningportal.gov.uk/pcs

The Secretary of State can allow for a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, he does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

2. Purchase Notices

If either the local planning authority or the Secretary of State for the Environment refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been, or would be permitted. In these circumstances, the owner may serve a purchase notice on the council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town & Country Planning Act 1990.

LISTED BUILDING CONSENT, CONSERVATION AREA CONSENT

3. Notification of Demolition

If listed building consent has been granted and any demolition is to take place, you must in accordance with Section 8(2)(b) of the Planning (Listed Building and Conservation Areas) Act 1990 complete a Final Notice of Demolition Form and send it to English Heritage at least one month before demolition occurs.

4. Appeals to the Secretary of State

If you are aggrieved by the decision of your local planning authority to refuse listed building or conservation area consent, or to grant either subject to conditions then you may appeal to the Secretary of State for the Environment in accordance with sections 20 and 21 of the Planning (Listed Building and Conservation Areas) Act 1990. Appeals must be made within 6 months of the date of the decision (see notes under 1 above).

5. Purchase Notice

If listed building or conservation area consent is refused, or if either is granted subject to conditions, and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted, he may serve on the District Council in which the land is situated a purchase notice requiring the council to purchase his interest in the land in accordance with section 32 of the Planning (Listed Building and Conservation Areas) Act 1990.

6. Compensation

In certain circumstances a claim may be made against the local planning authority for compensation as provided for under Section 27 of the Planning (Listed Building and Conservation Areas) Act 1990.

CONSENT TO DISPLAY AN ADVERTISEMENT

7. Appeals to the Secretary of State

If you are aggrieved by the decision of the local planning authority to refuse consent to display an advertisement, or to grant consent subject to conditions then you may appeal to the Secretary of State for the Environment under Regulation 15 of the Town and Country Planning (Control of Advertisements) Regulations 1992. Appeals must be made within 8 weeks of the date of the decision (see notes under 1 above)





SPECIFICATION NOTES

General
Plants shall be set out exactly as shown on this drawing. The Contractor shall inspect the site before planting to ensure all conditions are satisfactory. All planting shall be undertaken to BS4228:2007. Code of practice for general landscape operations, and to the Part 2 conditions with the Contractor of Road Supply and Laidwork (SPLS) 1995, as published by the Joint Council for Landscape Instructors.
No substitutions will be accepted without the prior agreement of the Landscape Architect. The Contractor shall replace at once all its own stock, species or variety of plant which has not been specified in the planting schedule. Plants supplied by the Landscape Architect shall be delivered to site in suitable weather conditions and shall be inspected when the soil is very wet, waterlogged or frozen.
Planting operations shall be undertaken in suitable weather conditions and shall be suspended when the soil is very wet, waterlogged or frozen.
Maximum care must be taken at all stages when handling plants to ensure as little disturbance as possible to the roots of plants, and balls should be kept intact during the planting operation.

Excavating Tree Protection
Areas of existing woodland and individual trees on the site will be protected by the use of steel fencing erected at a specified distance from the base of the trees (to be agreed with the Local Planning Authority (LPA), to British Standard BS5228:2007).
All tree protection fencing will be erected prior to the commencement of the development. This fencing will be regarded as essential. Once erected the fencing will remain in situ and will be removed at a later date should the prior consent of the LPA's Arboricultural Officer in consultation with the Landscape Architect / Arboriculturist.
Prior to and during construction works on site no spot or construction materials will be stored where the cover of any trees is, or adjacent to the site, even if proposed development is to be within the cover of them. Any encroachment within this protected area will only be with the prior agreement of the LPA's Arboricultural Officer.

Implementation Programme
All soil works shall be implemented not later than the first planting season (October to March) following the substantial completion of the construction works of the principal Contractor and where necessary practical implemented before or during the construction works.

Ground Preparation
All planting and grass areas shall be excavated to the specified depth and the base of all planting beds and lawns tamped to 250mm minimum. To provide free drainage. Areas within 10m of existing tree stems or 3m from existing hedge rows shall be broken by hand, taking care not to damage any roots. All drainage shall be to the surface by means of a drainage system. No concrete, rubble or debris in subsoil layers will be accepted prior to topsoiling.
Where necessary areas to be planted or seeded shall be cleared of any grass, weed growth or debris physically or chemically with a registered herbicide (Cytosol) prior to cultivation operations. Where there are any areas where it is necessary to ensure eradication, spraying is carried out by skilled and qualified operatives. Long protective clothing is suitable in accordance with the requirements of BS 4730:1987, for fire resistance and have a pH of between 4.5 and 5.5. Work to be carried out to a depth of 200mm following settlement, with the level of work to be maintained to a minimum of 200mm below adjacent surfaces, preventing splash.
Fertile beds with Vitax 'Multicote 182' slow release fertiliser or similar, at the rate of 100g per square metre, or in accordance with the manufacturer's instructions.

Topsoil
All topsoil to conform to BS 3882:2007. Specification for topsoil and requirements for use.
Topsoil shall consist of a natural, stable surface soil of organic character, free of decomposable quantities of sub-soil, roots, stones and other hard substances. Imported topsoil shall be free from rocks over 20mm, concrete, rubble, and other alien matter, and a representative sample shall be approved by the Landscape Architect prior to delivery to site. All soil shall have a maximum clay content of 20%.
Topsoil taken from stockpiles on site shall have been loose topped, not piled above 25m and shall not have been compacted by vehicles.
Grass areas to have a minimum depth of 150mm topsoil.
Drainage including hedge rows to be a minimum depth of 300mm topsoil.
Tree pits within soft landscape areas shall be excavated to a minimum size of 600 x 600 x 600mm deep and backfilled with approved topsoil to 150mm depth of free flow (as defined). All tree pits to be thoroughly unobstructed across base and sides prior to backfilling.
Break up topsoil to depth of 400mm, ensuring that the subgrade and topsoil are completely broken up and free draining. Areas within 10m of existing tree stems or 3m from existing hedge rows should be broken by hand, taking care not to damage any roots.
Finished levels of drains and hedge beds shall be 20mm below finished subgrade levels to allow for finish. This is to allow the finished level to be raised 20mm before adjacent surfaces, preventing splash.

Mulching
If specified as specified, 'COMBITEK' woven black plastic fabric or similar to be used. Certified and secured with heavy metal hoops or 300mm wooden pegs (according to ground conditions). To be installed to manufacturer's guidelines. Available from H.V. TEX UK Ltd (Tel: 01203 723070).
All bark wood chip mulches shall be free of dust and fines, with samples approved by the Landscape Architect. All such products shall be aged, disease and weed free and not treated with herbicides or any other chemicals. It shall be tested in accordance with the requirements of BS 4730:1987, for fire resistance and have a pH of between 4.5 and 5.5. Bark to be evenly spread to a depth of 20mm following settlement, with the level of work to be maintained to a minimum of 200mm below adjacent surfaces, preventing splash.

Proposed Tree Planting
Each specimen tree shall have a single leader with a well developed, balanced crown and clear straight stem. Trees shall be supported as follows:
Trees 10-12m high and above shall have a double stake located to each side of the rootball with the top of each stake to be attached to the trunk with a 'Thru-the-Trunk' T x 2" available from 'Tree-Tech Ltd' to manufacturer's instructions.
Trees 5-10m high and below shall have a single stake. The stake to be attached to the trunk with a 'Thru-the-Trunk' T x 1" available from 'Tree-Tech Ltd' to manufacturer's instructions.

Proposed Shrub and Hedge Rows
All shrubs shall be either bare root or container grown, bushy and have a minimum of three lateral branches from the base of the plant with full root development to the container.
Single row hedges shall be planted in a prepared trench, minimum 1200mm wide and 300mm deep at all locations at the centre of the trench. Following planting the top of the hedge row plants shall be pruned as required with secateurs to create a straight level top to the hedge.
Double staggered row hedges shall be planted in a prepared trench, minimum 1500mm wide and 300mm deep at all locations at the centre of the trench. Following planting the top of the hedge row plants shall be pruned as required with secateurs to create a straight level top to the hedge.

Grass Areas
All grassed areas to conform to BS 4228:1999.
Seed shall conform to the UK Seeds Registration and High Purity Voluntary Standard (HVS) and the ECC Seeds Directive, for purity and germination of species. A sample of each seed shall be given to the Landscape Architect for approval, together with certification that the above requirements have been met. Grass seed shall be:
• General sowing mix with seed of no grass, sowing and seedling to be approved.
• Rate of application: 30g per m².
Seed shall be laid on a prepared base of topsoil 100mm deep, cultivated to a fine tilth with all stones larger than 10mm diameter removed. Prepared areas to be levelled but with slight surface fall.
Water regularly until established and a 150mm high green sward of grass is evident. The grass to be cut to 50mm in height for the first cut and to be kept to a maximum of 50mm in height subsequent cuts. Areas shall be kept topped and scattered on site. Volunteer and other types of seed are dealt with in detail within the Landscape Specification. Areas that have not become successfully established shall be re-sown in the next available season.

Climbing Stakes
Unwaxed timber support wires with galvanneal hook eyes shall be secured vertically on one side of fence and wire and tensioned between the top and bottom eye to provide an initial support for the climbing shrub up the side of the fence. Original timber support wires to be tied on to wire to encourage climber on to wire.

Bark Planting
Supply and plant in situ as specified in the plant schedule in late summer or early autumn. Check the plants removing any loose outer coatings and root balls, prior to planting. Plant stakes at appropriate depth, check with supplier (Duffield 10-100mm deep). Plant necessary in locations specified at a density of 20m². Firm back at soil level and afterwards.

Soil and Road
Soil matting to be supplied and installed by specialist manufacturers instructions.

Maintenance / Making Good Details
The Landscape Contractor shall maintain the site for a period of 12 months following practical completion. The site shall be maintained for a period of 5 years by the Landscape Contractor. Re-vegetation and/or other work as appropriate. All planting areas are to be kept free of weeds for the duration of the maintenance period.
All plants that are hand dead, diseased or dying at the end of the first growing season shall be replaced at the Contractor's own expense in the next available planting season. Areas of turf or soil that have not become successfully established shall be re-laid free seed in the next available season.
Check all the security and fittings of low walls and paths, stakes and plants and make any necessary adjustments to prevent abrasion and damage to trees. All trees shall be kept topped and staked in where necessary. Stakes and Spine Guards shall be checked for possible removal from year 3 onwards.

PLANT SCHEDULE

QTY	ABBREV	PLANT NAME	STOCK	GRADE	SPACING
1000	Vin maj	Vinca major	C 2L	3/2	

BULBS PLANTS

QTY	ABBREV	PLANT NAME	STOCK	GRADE	SPACING
882	Nar pse	Narcissus pseudonarcissus	10-12cm	20/m ²	

CLIMBERS

QTY	ABBREV	PLANT NAME	STOCK	HEIGHT	HABIT
127	Hel Den	Hedera colchica "dentata variegata"	C 3L	60-80cm	Self-climber

TREES

QTY	ABBREV	PLANT NAME	STOCK	FORM	GIRTH/HEIGHT
230	ACE CAM s	Acer campestre	B	STD	10-12cm
140	BET PEN s	Betula pendula	C 2SL	STD	8-10cm
30	LIZ MOR s	Liquidambar styraciflua "morplesdon"	B	STD	10-12cm

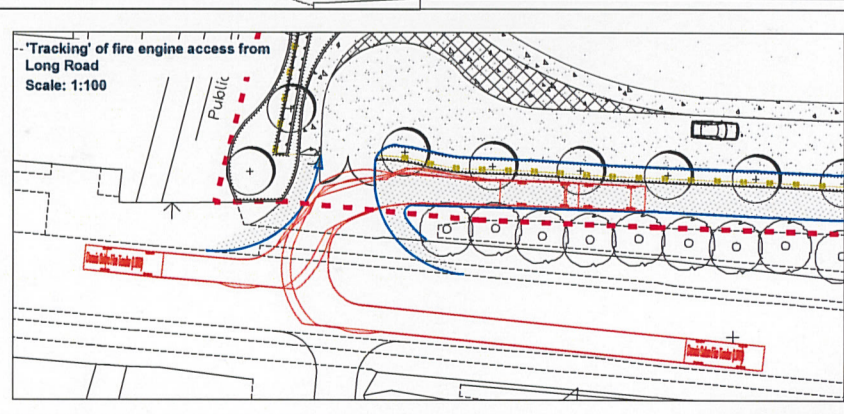
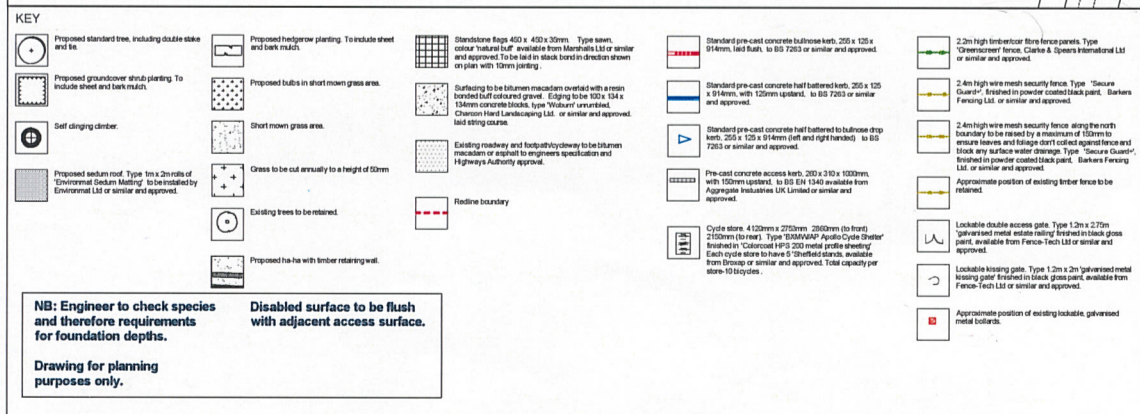
HEDGES

QTY	ABBREV	PLANT NAME	STOCK	SIZE
132	Yew hedge	Taxus baccata	C 1L	80-100cm
2080		Plants spaced @ 4m in a double staggered row		

HEDGE MIXES

PERCENT	QTY	PLANT NAME	STOCK	SIZE
32%	NATIVE HEDGE MIX 1	planted @ 6m in a double staggered row		
50%	9840	Corylus avellana	B	Trans 60-80cm
20%	1840	Corylus avellana	B	Trans 60-80cm
20%	3940	Corylus avellana	B	Trans 60-80cm
3%	280	Lilium sp.	C 1L	40-60cm
5%	280	Rosa canina	B	Trans 60-80cm

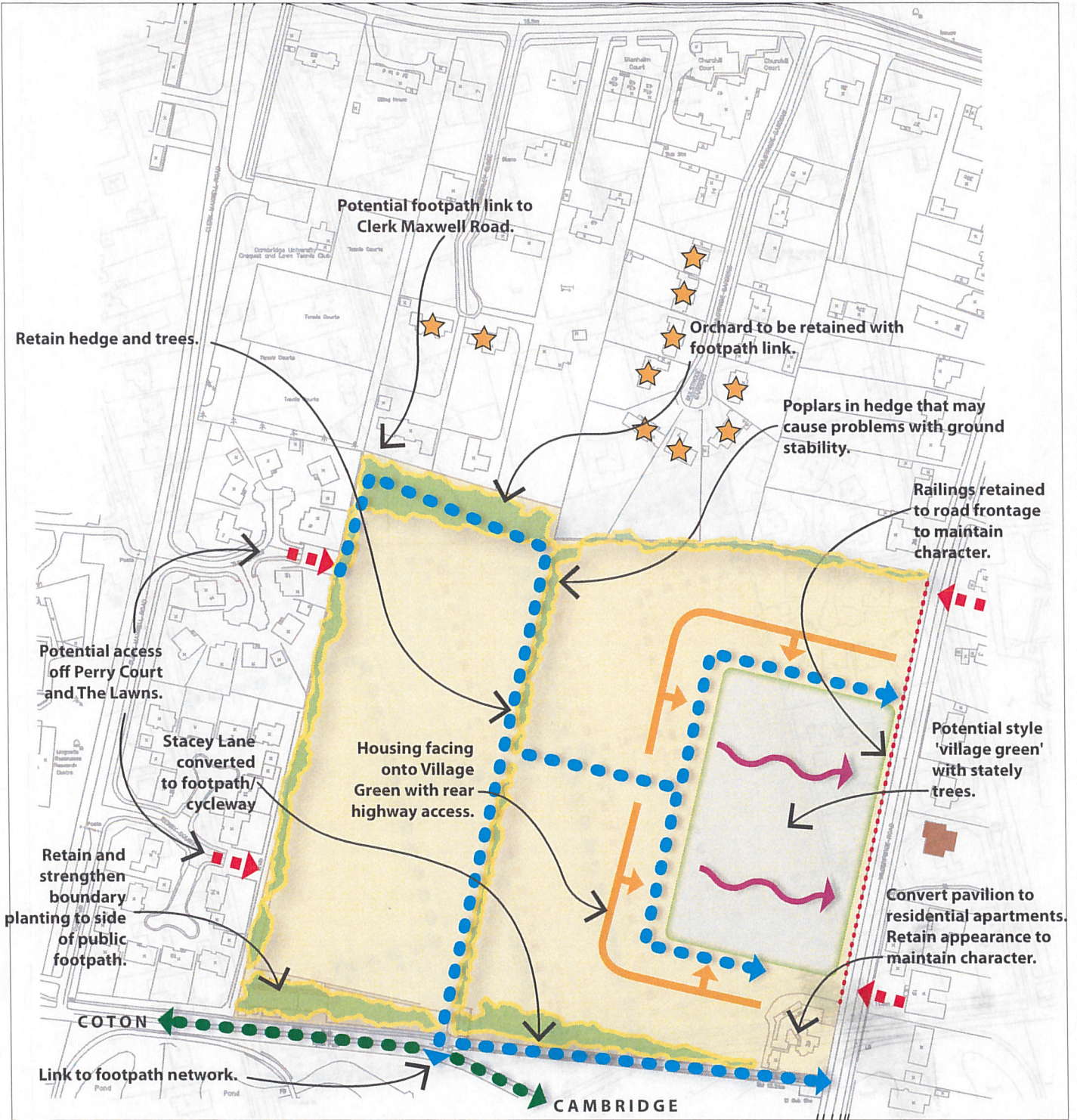
NOTES AND ABBREVIATIONS:
QTY = Quantity
FORM = Shape of tree as supplied by the nursery.
TRANS = Transplant or undercut seedling.
STD = (clear stem) standard.
C1SL = Circumference of tree stem measured 1 metre above ground level.
STOCK = Root condition/protection method eg bare root, B = Bare root (balled), NB = Balled (balled and wrapped), C = Container (or pot) grown, followed by size of the container (or pot).
SIZE = Height or spread of juvenile plant.
HABIT = Juvenile habit or plant shape as supplied by the nursery.
Climber = Self-climbing climber to be attached to cane/wire, refer to specification.
Refer to specification for further information.
All plants to be completely hardened off.
Substitutions to be agreed with Landscape Architect.
Plant schedule generated by "iScape" software 22/08/2012



APPENDIX F
OPPORTUNITIES, CONSTRAINTS AND
CONCEPT FRAMEWORK PLANS

Land West of Wilberforce Road, Cambridge

Opportunities and Constraints Plan



KEY

- Potential open space
- Vegetation retained and enhanced
- Vehicular site access points
- Proposed footpath/cycleway links
- Public Right of Way - Harcamlow National Trail
- Grade II Listed building
- Positive Unlisted building
- Important Positive Frontage Views to Wilberforce Road retained

Land West of Wilberforce Road, Cambridge

<p>TITLE Opportunities and Constraints Plan CLIENT Gonville & Caius DRG NO. S037500100-01 REVISION</p>	<p>DATE September 2013 SCALE 1:2500 @ A4 DRAWN JJD CHECK PNA OS LICENSE NO. 100017734</p>	<p>REVISIONS</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">REV.</th> <th style="text-align: left;">DATE</th> <th style="text-align: left;">DETAILS</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	REV.	DATE	DETAILS				<p>DRAWN</p> <p><small>GENERAL Do not scale from this drawing. All dimensions to be checked on site. This plan is to be read with all accompanying documentation. © Bidwells 2013</small></p>
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BIDWELLS

Land West of Wilberforce Road, Cambridge

Concept Framework Plan



KEY

- Low Density Housing (1.3ha) @ 8-10dph.
- Medium Density Housing (0.94ha) @ 20dph
- Affordable Housing - (1.5ha) (40%)
- Conversion of pavilion to residential apartments (0.16ha)
- Open Space to Wilberforce Road (1.15 ha)
Total Green Space (2.8ha)
- Vegetation retained or proposed
- Vehicular site access points
- Proposed Footpath and Cycleway Links

Land West of Wilberforce Road, Cambridge

TITLE Concept Framework Plan
 CLIENT Gonville & Caius
 DRG NO. S037500100-02
 REVISION

DATE September 2013
 SCALE 1:2500 @ A4
 DRAWN JJD
 CHECK PNA
 OS LICENSE NO. 100017734

REVISIONS

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