



# CULTURAL HERITAGE DESK BASED ASSESSMENT - METHODOLOGY

HORSHAM DISTRICT COUNCIL LOCAL PLAN REVIEW

## Abstract

The Horsham District Council administrative area contains a rich variety of heritage assets with 1537 listed buildings, 26 conservation areas, 178 archaeological notification areas, 96 archaeological sites, 5 registered parks and gardens and 29 scheduled monuments. The NPPF 2023 identifies that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Local plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

## CONTENTS

	Page
<b>Introduction</b>	2
<b>Methodology</b>	2

## Introduction

This document draws together the housing, employment and gypsy sites identified within the Horsham District Local Plan Review. The document provides an overview historic environment assessment for each site. It seeks to establish and identify both designated and undesignated heritage assets, and identify where their significance may be altered by proposed development. The role of this study is to proactively identify heritage concerns as part of the local plan process. It is written as a high level assessment and should not be used as a comprehensive assessment of each site. A full historic environment assessment would be expected to be provided as part of any development/site promotion.

## Study Area

The study area for each overview historic environment assessment is defined as the proposed site, and a 1km extension from the boundary of the site.

## Methodology

The methodology used for the overview historic environment assessment is provided below, together with the methodology for assessing the significance of effects. Whilst undertaking this study a high level assessment was undertaken. This study included:

- a review of desk-based data within the study area, using sources detailed in **Table 4**, as well as relevant readily available regional and local contextual studies, desk and field studies, and historic mapping;
- Topographical survey
- Visualisation Impact assessment - wider views etc (to establish the extent of setting, sense of place and local distinctiveness.
- Desktop Research including Historic map regression to link to landforms and key features

As part of a full historic environment assessment to establish a baseline, appropriate and proportionate assessments should be carried out. The Assessment of Effect Methodology is required to be carried out by a suitably qualified and experienced heritage consultant.

## Statutory Duty with regards to Heritage

### **Ancient Monuments and Archaeological Areas Act 1979**

The Ancient Monuments and Archaeological Areas Act 1979 (as amended) sets out the legislative framework for the designation of and protection of scheduled monuments.

### **The Planning (Listed Buildings and Conservation Area) Act 1990**

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a “General duty as respects listed buildings in the exercise of planning functions.”

Subsection (1) provides:

*“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.”*

## Planning Policy

### **National Planning Policy Guidance 2023 (NPPF)**

Chapter 16 of the NPPF sets out the Government’s policy regarding conserving and enhancing the historic environment. Paragraph 200 indicates with regard to determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, and putting them into viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality as well as the desirability of new development making a positive contribution to local character and distinctiveness.

When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF considers that great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).

When considering potential harm to heritage assets the NPPF sets out a terminology of substantial harm, total loss or less than substantial harm to its significance. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and

convincing justification. Set out below is the guidance within the NPPF relating to the balance to be taken between the significance of an asset, the level of harm and potential public benefits;

*“Substantial harm to or loss of:*

*a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

*b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

*207. 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 total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

*a) the nature of the heritage asset prevents all reasonable uses of the site; and*

*b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*

*d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

*208. 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, where appropriate, securing its optimum viable use.*

*209. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*

The NPPF is supported by the PPG (July 2019). In relation to the historic environment, paragraph 002 (002 Reference ID: 18a-002-20190723) states that:

*“Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning*

*permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.”*

## **Horsham District Planning Framework 2015**

Policy 34 of the current Horsham District Planning Framework relates to Cultural and Heritage Assets. The policy notes that the Council recognises that heritage assets are an irreplaceable resource, and as such positive management of heritage assets will be required to sustain and enhance the historic environment.

### **Guidance**

*The Good Practice Advice In Planning Note Managing Significance in Decision-Taking in the Historic Environment* (Historic England 2015).

The purpose of this document 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 NPPF and NPPG. It outlines a 6-stage process to the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development.

- 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 Good Practice Advice In Planning Note 3 The Setting of Heritage Assets* (Historic England 2017)

Historic England’s Historic Environment Good Practice Advice in Planning Note 3 provides guidance on the management of change within the setting of heritage assets.

The document restates the definition of setting as outlined in Annex 2 of the NPPF. Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors. The document makes it clear that setting is not a heritage asset, nor is it a heritage designation, though land within a setting may itself be designated. Its importance lies in what the setting contributes to the significance of a heritage asset.

The Good Practice Advice Note sets out a five-staged process for assessing the implications of proposed developments on setting:

1. Identification of heritage assets which are likely to be affected by proposals;
2. Assessment of whether and what contribution the setting makes to the significance of a heritage asset;
3. Assessing the effects of proposed development on the significance of a heritage asset;
4. Maximising enhancement and reduction of harm on the setting of heritage assets; and
5. Making and documenting the decision and monitoring outcomes.

### **Assessment of effects and determining significance**

National Planning Policy Guidance 2023 (NPPF) requires change to the significance of heritage assets to be considered in developing an understanding of the potential effects of the development.

The NPPF<sup>1</sup> defines heritage assets as being; *“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. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”*

#### Designated heritage assets

The glossary of the NPPF refers to a designated heritage asset as being a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

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<sup>1</sup> [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)

## Non designated heritage assets

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets<sup>2</sup>.

## Significance

The significance of a heritage asset is a product of its evidential, historical, aesthetic or communal value which it holds to this and future generations because of its heritage interest. The National Planning Policy Framework states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. These interests are discussed in more detail in Conservation Principles and GPA2 (Historic England 2015).

## Setting

Significance does not relate purely to the physical presence of the asset but also from its setting. The glossary of the NPPF defines the setting of a heritage asset as ‘the surroundings in which a heritage asset is experienced’. Where that experience is capable of being affected by a proposed development then the proposed development can be said to affect the setting of that asset. Setting is not fixed and may change as the asset and its surroundings evolve. The Assessment Checklist within the GPA Note 3 (The Setting of Heritage Assets) outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. An asset’s intangible associations with its surroundings, and patterns of use can contribute or enhance the significance of one or more of the heritage assets.

Paragraph 18a-013 of the PPG on the Historic Environment

(<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#decision-making-historic-environment>) concludes:

*“The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the*

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<sup>2</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#non-designated> accessed 18.08.2020



*fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation."*

### Assessment

For the purposes of assessing the significance of effects, heritage significance is assigned to one of four classes within this study, with reference to the heritage interests described above and relying on professional judgement as informed by policy and guidance.

The hierarchy given in **Table 1** reflects the distinction between designated and non-designated heritage assets. It distinguishes between designated assets of the highest heritage significance (i.e. scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites) and other designated heritage assets.

**Table 1: Establishing the sensitivity of receptors**

Sensitivity	Criteria	Receptor type
<b>High + 3</b>	Assets of national importance, which have significance for an outstanding level of archaeological, architectural, artistic or historic interest. It is possible that low-moderate impacts upon these assets or their settings could lead to significant effects.	Designated heritage assets.
<b>Medium + 2</b>	The sensitivity of these assets will largely be dependent upon their current setting and their character.  Asset has significance for a high level of archaeological, architectural, artistic or historic interest.	Non-designated sites and monuments of regional importance.
<b>Low + 1</b>	Assets of local interest, which have significance for elements of archaeological, architectural, artistic or historic interest.  Although these assets must be considered, and mitigation may be required, it is considered that significant effects would only exist if the assets were to be predominantly or totally destroyed as a result of the Proposed Schemes.	Non-designated assets of local importance
<b>Negligible - 0</b>	Due to its nature of form / condition /survival, cannot be considered as an asset in its own right	Non-extant HER record

The magnitude of change (or impact) is based on the extent to which the significance of an asset is affected, which can be influenced by a number of factors:

- the permanence of the impact (temporary, permanent or reversible);

- physical changes caused by the impact (both positive and negative); and
- the extent of the heritage asset or its setting that would be affected (for example, the whole or a very small part) and the contribution of that part to significance.

Impacts on heritage assets, are assigned to one of four classes of magnitude, defined in **Table 2**. Impacts can be adverse or beneficial. It is recognised that a positive contribution to the historic environment can be achieved through development.

**Table 2: Establishing the magnitude of change**

<b>Sensitivity</b>	<b>Criteria (Adverse) +</b>	<b>Criteria (Beneficial) -</b>
<b>High 3</b>	Loss of significance resulting from irreversible total or substantial demolition or disturbance of a heritage asset or from the disassociation of an asset from its setting.	Sympathetic restoration of an at-risk or otherwise degraded heritage asset and/or its setting. Bringing an at-risk heritage asset into sustainable use, with robust long-term management secured.
<b>Medium 2</b>	Loss of significance arising from partial disturbance or inappropriate alteration of asset which will adversely affect its importance. Change to the key characteristics of an asset's setting, which gives rise to lasting harm to the significance of the asset, but which still allows its archaeological, architectural or historic interest to be appreciated.	Appropriate stabilisation and/or enhancement of a heritage asset and, or its setting that better reveal the significance of the asset or contribute to a long-term sustainable use or management regime.
<b>Low 1</b>	Minor loss to, or alteration of, an asset which leaves its current significance largely intact. Minor and, or short-term changes to setting which do not affect the key characteristics and in which the historical context remains substantially intact.	Minor enhancements to a heritage asset and, or its setting that better reveal its significance or contribute to sustainable use and management.
<b>Negligible 0</b>	Minor alteration of an asset which does not affect its significance in any discernible way. Minor and, or short term or reversible change to setting which does not affect the significance of the asset.	Minor alteration of an asset which does not affect its significance in any discernible way. Minor and, or short term or reversible change to setting which does not affect the significance of the asset.

The matrix in **Table 3** has been prepared to guide the assessment of whether effects on the historic environment are to be considered significant or not. The classification of the effect is judged on the relationship of the magnitude of impact to the assessed heritage significance of the resource. As a general rule, major and moderate effects are considered to be significant and minor and negligible effects are considered to be not significant. However, professional judgement is applied, where appropriate, to determine significance of effect.

**Table 3: Significance assessment matrix**

Receptor heritage significance	Magnitude of Change			
	High 3	Medium 2	Low 1	Negligible 0
High 3	Significant 6	Significant 5	Potentially Significant 4	Not Significant - 0
Medium 2	Significant 5	Potentially Significant 4	Not Significant 3	Not Significant 2
Low 1	Potentially Significant 4	Not Significant 3	Not Significant 2	Not Significant 1
Negligible 0	Not Significant 3	Not Significant 2	Not Significant 1	Not Significant 0

Any assessments would be expected to set out the significance of the relevant heritage asset(s), and where appropriate the contribution of their settings to significance, providing a description of the anticipated change and setting out the magnitude of change in line with the definitions set out **Table 3**. Historic England's Good Practice Advice Note 3 (Second Edition) on The Setting of Heritage Assets sets out a staged process to assess setting, and its contribution to the significance of a heritage asset. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its

importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. The effects of change in the setting of a heritage asset depends on the contribution of that setting to the significance of the asset, and assessments must be, by their nature, specific to the individual assets being considered.

Following an assessment of the significance of effect, any harm to heritage assets should be identified as ‘substantial harm’ or ‘less than substantial harm’ in the terms of the NPPF.

## Baseline conditions

### Data sources

The principal data sources used to inform this outline assessment are listed in **Table 4**.

**Table 4: Key sources of historic environment data**

Source	Date	Summary	Coverage of study area
<b>National Heritage List for England (NHLE) maintained by Historic England</b>		National Heritage List for England (NHLE), for information on designated heritage assets (scheduled monuments, listed buildings, registered parks and gardens, registered battlefields and world heritage sites) available online:  <a href="https://historicengland.org.uk/listing/thelist/">https://historicengland.org.uk/listing/thelist/</a> .	Full coverage of the study area
<b>West Sussex Historic Environment Record (HER)</b>		GIS-based records of a wide range of buildings, monuments, find spots, places, and landscapes of archaeological, architectural, artistic or historic interest.	Full coverage of the study area

The study area will be determined with reference to the;

- landscape context,
- type of heritage asset and;

- nature of development.

The study area will be informed through;

- baseline study,
- local knowledge.