

Mr K. S. Missan
October 2023



HERITAGE STATEMENT EASTHORPE GARDENS, RUDDINGTON

Quality Assurance

Site name:	Easthorpe Gardens, Ruddington
Client name:	Mr K.S. Missan
Type of report:	Heritage Statement
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Date	13 th October 2023
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Heritage Legislation, Policy and Guidance Summary

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Methodology

1.0 Introduction

- 1.1 This Heritage Statement has been prepared by Bidwells on behalf of Mr K.S. Missan to support an application for full planning permission in relation to proposals for the construction of a new access track at Easthorpe Gardens, Ruddington, hereafter referred to as the site.
- 1.2 Pre-application advice was received from Rushcliffe Borough Council on 27th March (ref: 23/00298/ADVICE), albeit this advice related to a scheme for a *'single replacement detached dwelling'*. This scheme also sought the installation of a new access track, therefore aspects within this advice (which directly relate to the access track) have been considered as part of the proposals here being discussed.
- 1.3 More specifically, in relation to potential impacts upon the green belt, it is stated that;
- 'the proposal includes the addition of a new access (approx. 57m long) and additional hardstanding area. The existing access, from aerial photographs appears to be a small informal track that hugs the northern boundary of the site more akin to a field access. The proposal indicates a formal access with a long winding driveway of a more formal and permanent nature in an areas void of development. It is considered that the addition of the hardstanding/ access would be contrary to Policy 21 and the NPPF in respect of inappropriate development in the Green Belt as it would not respect the existing green/ open nature of the land to the south of the proposed dwelling. It would introduce a harsh urbanising form, of a significant length, impacting on the openness of the Green Belt, and would conflict with the purposes of including land within it as it would not safeguard the countryside from encroachment'*.
- 1.4 In relation to trees it is stated that;
- 'I note a new access is proposed to the immediate south of a large boundary tree. The application will need to demonstrate the new access will not harm the roots of the tree. Ideally the new access would be located outside of the tree's root protection area, but if not, some form of 'no-dig' porous construction would be required'*.
- 1.5 However, it is of particular relevance to highlight that heritage provided no comments in direct relation to the construction of an access track. Further, and while it is acknowledged the comments below relate to the proposed new building, it was clearly set out that;
- 'the location is outside of the parkland setting of Easthorpe House and located beyond the separately listed former stables. There would be no impact on the inter-relationship between listed buildings within the site or the ability to appreciate that inter-relationship in ways which contributes to their significance'*.
- 1.6 Following receipt of the above advice, a scheme for a new access track has been revised, with a design which directly responds to all comments of relevance. The impact of this upon all heritage assets of relevance has therefore been set out within this report.
- 1.7 This document has been prepared by Sarah Burdis BSc (Hons), MSc, Ma (Principal Heritage Consultant) and reviewed by Katherine Harrison BA (Hons), MSt, IHBC (Principal Heritage Consultant).

2.0 Historic Context

- 2.1 The site is located to the east of the main settlement of the village of Ruddington.
- 2.2 Ruddington has Saxon origins and grew rapidly during the Industrial Revolution to become the largest frame knitter's village in Nottinghamshire South of the Trent. New housing was built to accommodate those involved in subsidiary trades. A number of the present-day Grade II Listed Buildings were former framework knitters' workshops or have workshops to the rear.
- 2.3 The site was historically part of the grounds of Easthorpe House, which is located to the east of Ruddington. The 1901 map below shows the extent of the grounds historically, which stretched from Flawforth Lane in the south to the river or stream in the north. There were two lodges along Loughborough Road, a windmill, and a stable and farm complex.



Figure 1: 1901 Ordnance Survey map, with the approximate location of the site highlighted in red.

Site History

- 2.4 The 1883-5 Ordnance Survey map shows the complex of buildings at Easthorpe House and the surrounding gardens. The buildings are much more interconnected than they are now, with footpaths linking each area together.
- 2.5 Easthorpe House itself is to the south-west of the complex. It is accessed via a drive leading from Loughborough Road. This drive also leads to the stable block which is to the north-east of the main house. The stable block has a footprint similar in size to the house itself and is on an approximate H plan. To the north of the stable block are a series of large greenhouses. To the north-east of the stable block is a dwelling, which is thought to partially survive within the modern day 'Easthorpe Gardens'. To the north-east of this is a large walled garden.

- 2.6 There are landscaped gardens to the east of Easthorpe House and the stables, which contain interconnecting paths between each phase of buildings. The landscaped grounds are walled off from the walled garden.
- 2.7 At the time of the 1883-5 map the farm to the east of the site has not yet been constructed, and neither has the private track off Flawforth Lane. The garden dwelling and walled garden are accessed via the rest of the site, and from the drive from Loughborough Road.

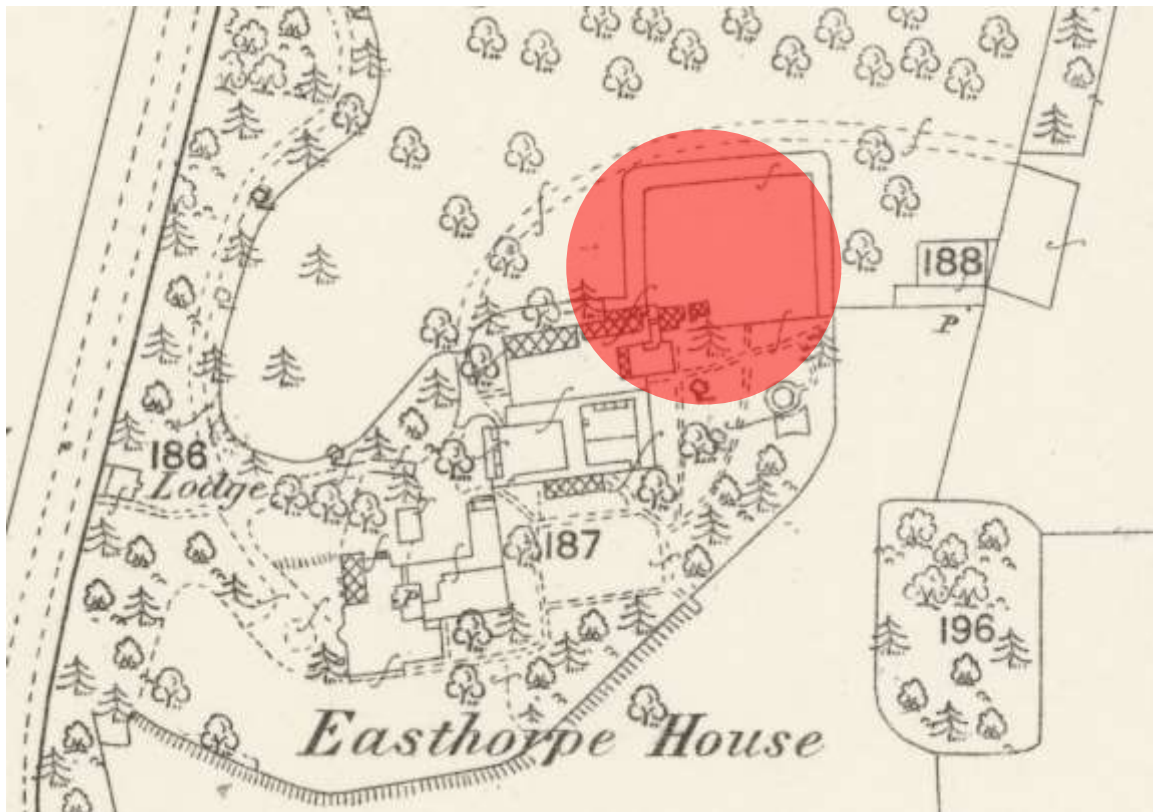


Figure 2: 1883-1885 Ordnance Survey map, with the approximate location of the site highlighted in red.

- 2.8 By the time of the 1899-1900 map, the wall between the formal and walled gardens has been removed, and there is now a path leading from the east of the House into the walled garden. The farm to the east of the site has been constructed and has now been incorporated into or replaced by a long agricultural building.
- 2.9 There is now a track leading from Flawforth Lane to the farm, although the garden dwelling and surrounding gardens are still primarily accessed via Loughborough Road.
- 2.10 There is also an access track leading from the north of the Easthorpe House site arching behind the wall garden and connecting to the farm.

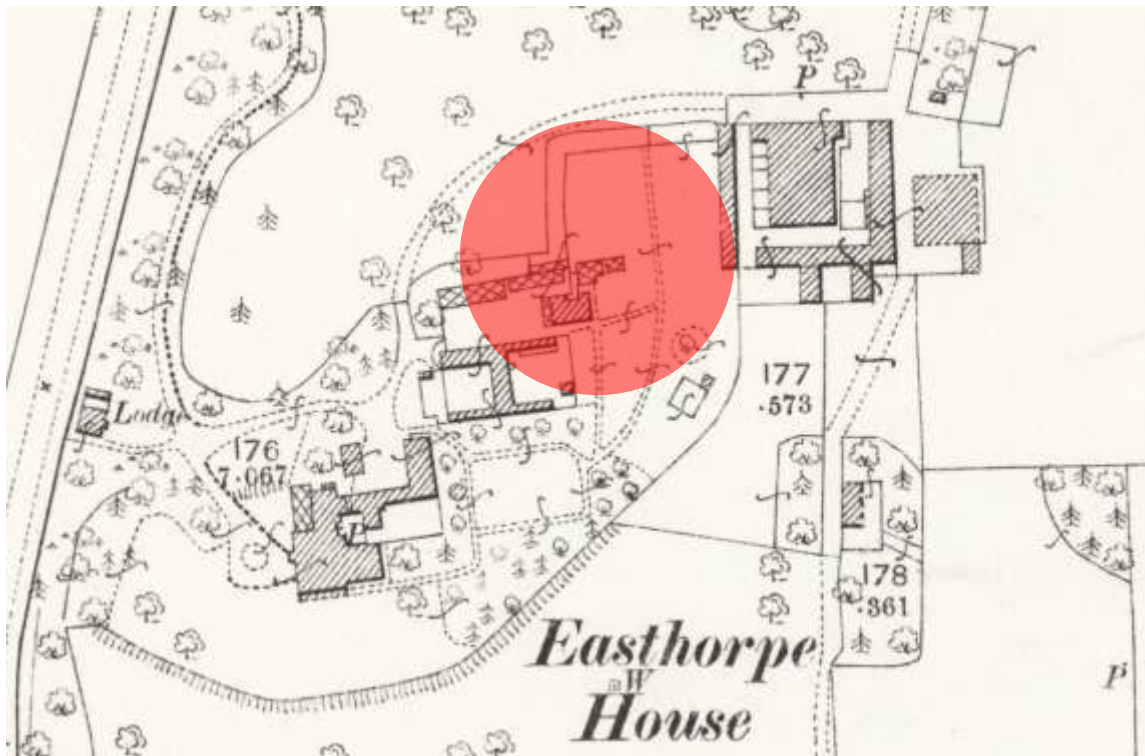


Figure 3: 1889-1900 Ordnance Survey map.

- 2.11 The 1913-14 map shows a development in the division of the land originally belonging to Easthorpe House and is closer to what can be seen today. Land to the north of Easthorpe House has been sold off and Woodlands constructed, and, because of this, there is no longer an access track between Easthorpe House and the farm.
- 2.12 The boundary between the gardens of Easthorpe House and the farm has also changed, with the boundary of the formal gardens being moved westwards, closer to the house and stables. The walled garden and land to the south, including the garden dwelling, seems to have been separated from Easthorpe House.
- 2.13 The garden dwelling (Easthorpe Gardens) has changed in shape, seemingly having been cut off at the western end. There is now a wall between the garden dwelling, and the greenhouses and stables to the west. The garden dwelling is now accessed via the gardens to the east, rather than from the drive to the east.
- 2.14 The 1938-48 Ordnance Survey map clearly shows that by this time, Easthorpe Gardens and the associated land is in separate ownership from Easthorpe House.

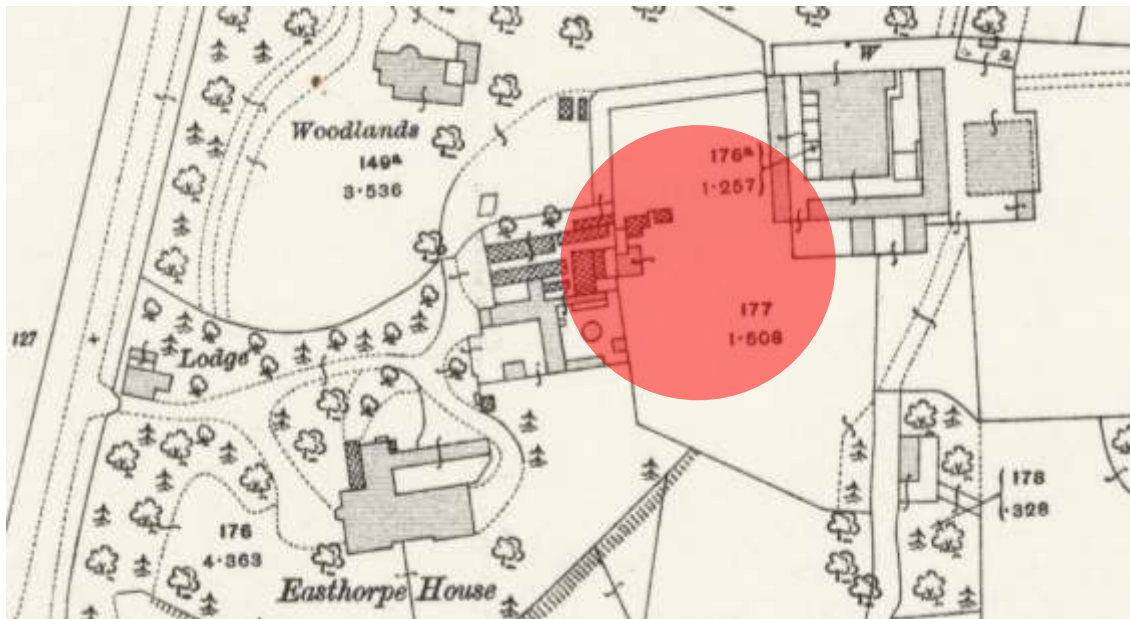


Figure 4: 1913-14 Ordnance Survey map.



Figure 5: 1938-48 Ordnance Survey map.

- 2.15 The 1963-68 Ordnance Survey map shows additions to the dwelling at 'Easthorpe Gardens'. The stable range has reduced in size and has been converted to domestic use.
- 2.16 The 2022 satellite image shows further developments to the footprint of Easthorpe Gardens, and from these images it is hard to determine whether much original fabric remains.

- 2.17 The former walled garden and lawned area to the south is within the ownership of Easthorpe Gardens, as is the small garden to the west of the dwelling which historically contained greenhouses. The dwelling has been extended to the west into this garden.
- 2.18 There is an area of trees between the site and the grounds of Easthorpe House which mostly screens the site from Easthorpe House.

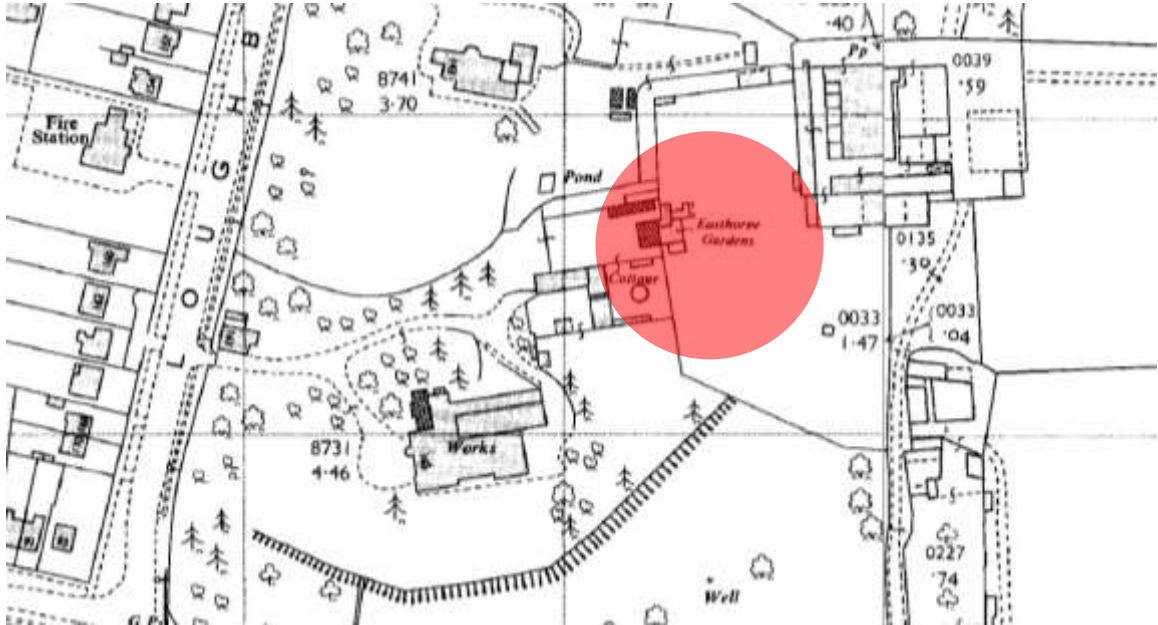


Figure 6: 1983-1968 Ordnance Survey map.

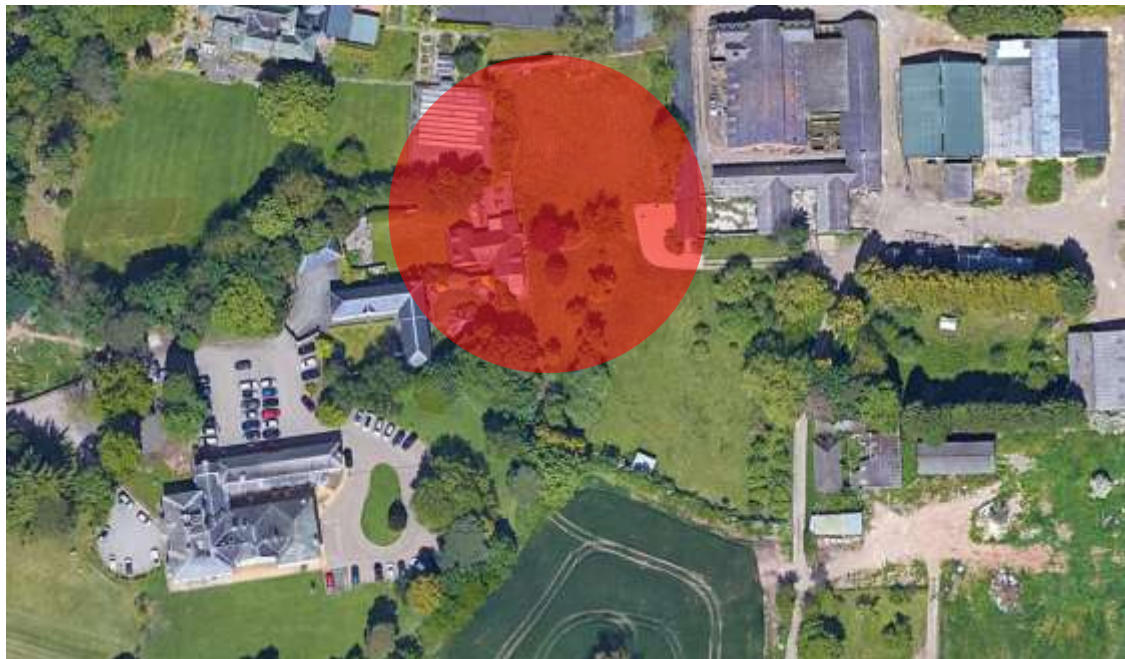


Figure 7: Google satellite image, 2022.

3.0 Heritage Assets

- 3.1 This section identifies built heritage assets which surround the site. In this case, the following heritage assets are local to the proposed development and have been identified as they may be affected by future development on the site. The identification of these assets is consistent with 'Step 1' of the GPA3 The Setting of Heritage Assets.
- 3.2 Although there are a number of assets within the local surrounding area, the location and significance of many of them results in them having no perceptible individual relationship with the proposed site. For this reason, only the heritage assets which may be considered to be affected by future development have been identified.
- 3.3 From an initial review, the following heritage assets may be affected by the proposed development of the site:
1. Easthorpe House – Grade II listed building
 2. Stable Block at Easthorpe House – Grade II listed building
 3. Animal Pen at Easthorpe House – Grade II listed building
 4. Ruddington Conservation Area
- 3.4 The following may be considered 'non-designated' heritage assets by the Local Planning Authority.
5. Former gardens and parkland of Easthorpe House (approximate historic boundary)
 6. Easthorpe Gardens dwelling
 7. Walled Garden
 8. Brick agricultural buildings (Easthorpe Farm)



Figure 8: Asset map, with the approximate site plan highlighted in pink.

4.0 Proposals

- 4.1 The scheme seeks the construction of a new access track, retention of an existing area of hardstanding, and provision of access through a marginally relocated former opening. Given the site's location within the setting of a number of heritage assets, its historic evolution and resulting built form has been considered in conjunction with latest planning policy, specifically in order to propose appropriate design solutions that are configured to ensure the preservation or enhancement of all assets of relevance.
- 4.2 More specifically, clear consideration of the opportunities and constraints afforded by the site and wider locale have been evidenced here. Therefore, the width of the proposed track has been reduced and now directly reflects that of the existing track. Such a design approach demonstrably ensures the informal character of the wider landscape would be referenced.
- 4.3 The proposed materiality also demonstrates clear consideration of the site's existing environs, with a combination of pea gravel atop a crushed stone base directly reflecting the surface finish of the existing track which defines the eastern boundary of the site.
- 4.4 The scheme also seeks to partially retain an area of existing hardstanding. Therefore, the current contribution to *'the openness of the Green Belt'* would not be altered, as this has already been established here. Given that this element of proposals have already been established on site, its retention would not fundamentally alter the way in which this aspect of the site – and its contribution to heritage assets of relevance or the green belt – would be perceived.
- 4.5 The existing driveway, providing access to the area of retained hardstanding, is proposed to be removed. This area will be re-grassed, demonstrably ensuring aspects of openness across this portion of the green belt would be reinstated and the potential for perceptions of urbanisation being reduced, as far as practically possible.
- 4.6 It is also of relevance to note that an historic field gate is located along the eastern boundary of the site. Again, the scheme has sought to reduce potential impacts upon the wider designated locale through the re-use of an existing access. However, it should be noted that the new track has been designed to ensure this will not harm to roots of an existing large boundary tree. As a consequence, the proposed location of access has been shifted slightly to the south, albeit the principle of access to this field from this boundary has already been established. Access to this portion of the site was reconfigured during the 20th century when this area was separated from the grounds of Easthorpe House.

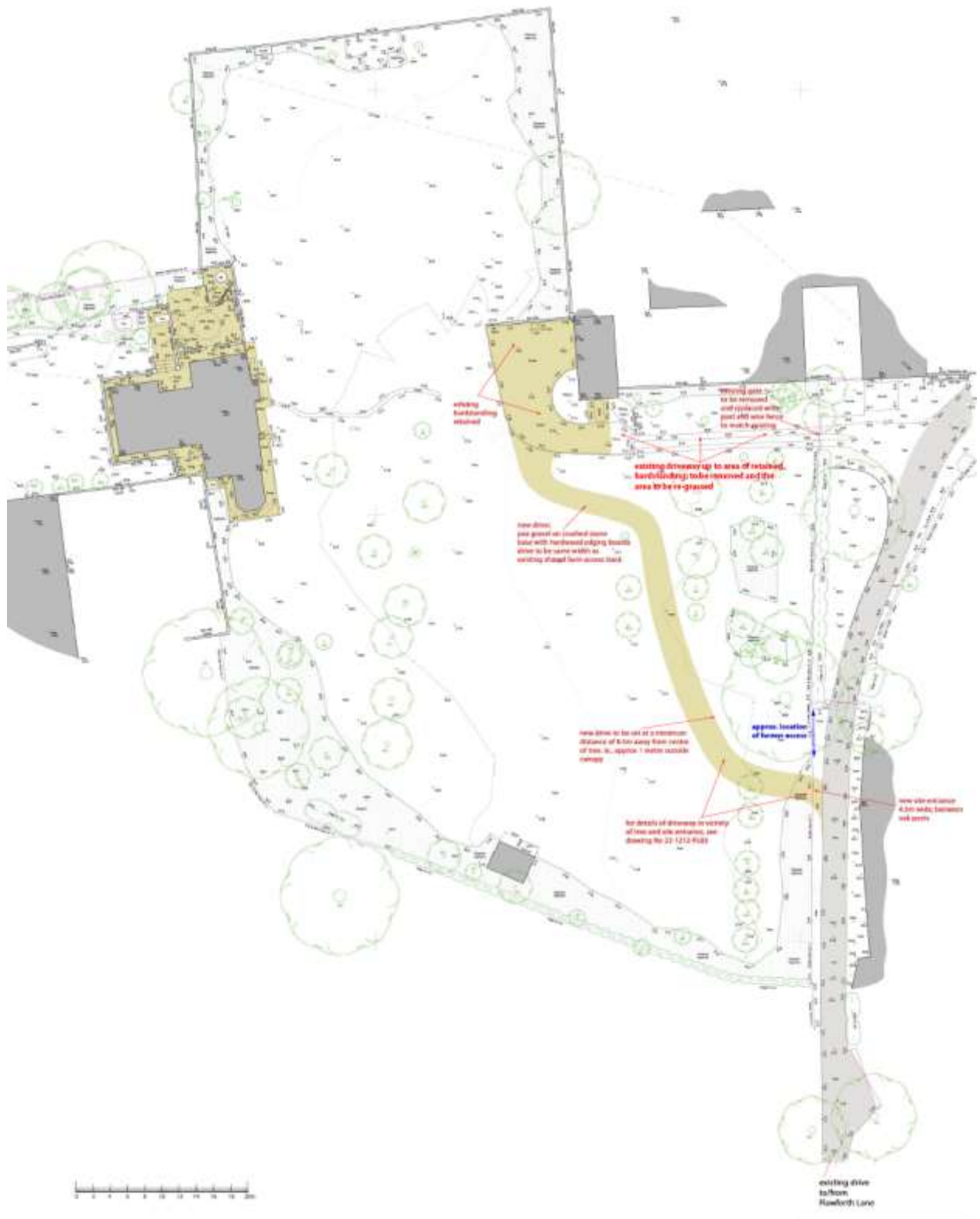


Figure 9: Proposed Route of New Access Track

5.0 Impact Assessment

- 5.1 In order to assess the suitability of the site for the proposed development, it is necessary to determine the *nature* and *extent* of any impacts resulting from the proposal on heritage assets and/or their settings.
- 5.2 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.
- 5.3 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.

Easthorpe House – Grade II Listed Building

- 5.4 Easthorpe House is considered to hold a **medium** level of significance given that it has been subject to extensive internal alterations as a consequence of conversion to office use. The application site is located to the east of Easthorpe House. Historically, this formed part of the grounds of the house, comprising a walled garden within the wider landscaped grounds.
- 5.5 However, the Easthorpe Gardens site was subject to subdivision during the early 20th century, with provision of access also being altered at this time. As a consequence, the site is considered to make a **minor beneficial** contribution to the significance of the setting of this asset, principally by virtue of the openness of the site on the southern side, where there exists a spatial relationship with the setting of this listed building.
- 5.6 Given the very minor nature of proposals, coupled with a referential width, materiality and already established acceptability of elements such as hardstanding, the new access track would result in a **neutral** impact upon the setting and therefore significance of Easthorpe House.

Stable Block at Easthorpe House, and Animal Pen at Easthorpe House – Grade II

- 5.7 Both the stable block and animal pen exhibit group value as farm outbuildings to Easthorpe House. As a consequence, they are considered to hold a **medium** significance.
- 5.8 The site is located to the east and north-east of the stable block and animal pen. Historic maps show that the assets were once part of the same site as ‘Easthorpe Gardens’ and there was likely a more direct relationship between the two. This relationship has changed considerably since the subdivision of the site, and the House, stable-block and animal pen are now more defined within their own setting and grouping.
- 5.9 Here it is of relevance to note that within an earlier application, the conservation officer has previously noted that;

‘the former gardens and parkland of Easthorpe House have been eroded by separation of ownership, subdivision and enclosure of land, 20th century agricultural developments, etc, such that on the ground the extent of garden and parkland is not immediately apparent, yet it remains. Mature trees are found to the north and east of Easthorpe House, but this is

much reduced to the area north and east of the stable block (now converged to residential use) and the animal pen’.

- 5.10 Given the overarching evolution of these heritage assets, in conjunction with the subdivision of the site from these and the reduction in the ability to appreciate their associations with Easthorpe House, it is considered that the site makes a **minor beneficial** contribution to the overarching significance of their setting.
- 5.11 The relationship of the stable block and animal pen are closest in association with Easthorpe House, and they are grouped and orientated towards it. Now that the land to the east of the House has been subdivided in terms of ownership, there is very little physical or visual relationship between these listed buildings and the site, other than the open character of the existing gardens.
- 5.12 The scheme proposes to retain the openness of the existing gardens where it is most closely associated with the listed buildings, including the walled courtyard garden to the north side of the stable block.
- 5.13 Further, the use of a referential track width, location of retained hardstanding and appropriate materiality, ensures the impact upon these heritage assets will be **neutral**.

Ruddington Conservation Area

- 5.14 The statutory duty under section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character and appearance of the Conservation Area. The Ruddington Conservation Area is considered to have a **good** level of significance.
- 5.15 However, it should be noted that although not located within the conservation area, the application site is located within its setting. As set out within the Townscape Appraisal, which accompanies the Conservation Area, open fields to both the north and south of the application site have been identified as positive open spaces. The site itself, has not. Therefore, its overarching contribution to this aspect of the setting of the conservation area is **neutral** with **no contribution** to its significance.
- 5.16 Given the account set out above, in conjunction with the very minor nature of the scheme, the ability to appreciate the significance of the character and appearance of the conservation area and its setting would not be fundamentally altered. It is therefore considered a **nil** impact upon the significance would accrue following the implementation of the scheme.

Non-designated Heritage Assets

Former gardens and parkland of Easthorpe House

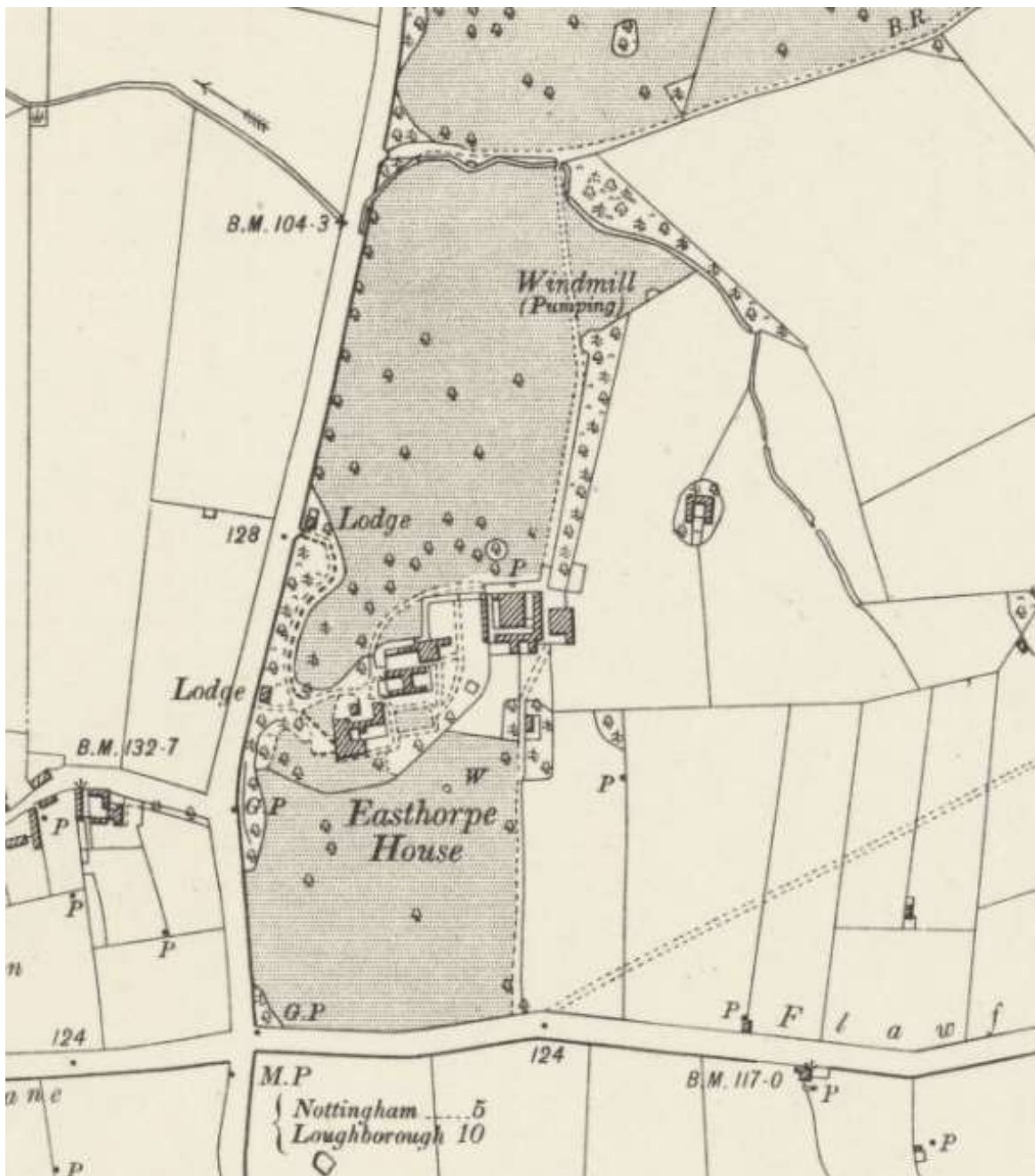


Figure 10: 1901 Ordnance Survey map, with historic extent of the gardens and parkland of Easthorpe House shaded in grey.

- 5.17 As set out above, within an earlier application, the conservation officer has previously noted that;
- ‘the former gardens and parkland of Easthorpe House have been eroded by separation of ownership, subdivision and enclosure of land, 20th century agricultural developments, etc, such that on the ground the extent of garden and parkland is not immediately apparent, yet it remains. Mature trees are found to the north and east of Easthorpe House, but this is much reduced to the area north and east of the stable block (now converged to residential use) and the animal pen’.*

- 5.18 However, the historic grounds of Easthorpe House still contain many mature trees and, despite the subdivision of land, the grounds can still to a limited extent be understood as forming part of the wider setting of Easthorpe House. The land to the north and south now has an agricultural, rather than a parkland, character, which limits the understanding of the grounds as a former cohesive area.
- 5.19 They now read as functionally separate to the ‘middle’ section of the parkland i.e., that land immediately around Easthorpe House and the walled garden and stables to the east, which can still be understood as historically linked. There is also a lack of historic landscape features in either of these areas beyond the immediate curtilage of the House.
- 5.20 Therefore, overall, the former gardens and parkland of Easthorpe House are considered to hold a **low** level of significance in heritage terms.
- 5.21 The site retains an open garden character, and while no longer a working garden, the historic brick wall means that its historic function is well understood. It can also still be understood as formerly belonging to Easthorpe House, due to the close proximity to the listed buildings, hierarchy of spaces, and partial views between the two sites.
- 5.22 Overall, the site in its current form is considered to make a **medium beneficial** contribution to the significance to the former gardens and parkland of Easthorpe House.
- 5.23 As noted, the application site historically formed part of the wider context of Easthorpe House, albeit cartographic extracts suggest this was located outside an area described as ‘parkland’. The construction of a new access track of a referential width, materiality, and limited perceptibility otherwise, would have **no impact** upon the former gardens and parkland of Easthorpe House.

Easthorpe Gardens Dwelling

- 5.24 Easthorpe Gardens is a dwelling located to the north-west of the application site. In the context of a recent planning application, the Conservation Officer confirmed that the dwelling is ‘*of no architectural or historic interest*’. The dwelling is accessed via a drive leading from Flawforth Lane, although the site was previously part of the grounds of Easthorpe House. Overall, the dwelling is considered to hold a **negligible** level of significance. It is not considered to hold sufficient merit to warrant identification as a non-designated heritage asset.
- 5.25 Additionally, the very minor nature of the scheme, in conjunction with aspects such as a referential width, materiality and reinstatement of historic access, **no impacts** upon significance would accrue following implementation of a new access here.

Former Walled Garden Walls

- 5.26 Located to the north of the site, the walls of the former walled garden of Easthorpe House partially survive as a boundary at the application site, enclosing its northern extents. However, this is now physically and visually separated from both the immediate setting and ownership of the house, resulting in a **low** level of significance.
- 5.27 Given that the scheme would not fundamentally alter the way in which the significance of this is appreciated, it is considered that **no impact** upon significance would accrue following implementation.

Brick Agricultural Buildings (Easthorpe Farm)

- 5.28 To the north-east of the site is a historic farm complex, which was built between 1885 and 1899. The eastern range was built alongside the historic brick wall of the walled garden at the site.

- 5.29 The 1899 map shows that there was originally access between the grounds of Easthorpe House and the farm, via a track leading from the stable range to the farm. By the time of the 1913 map, the house at Woodlands had been built, severing this connection.
- 5.30 As a grouping of traditional farm-buildings, once associated with Easthorpe House, the farm-buildings hold a **low** level of significance. Given that the scheme would not fundamentally alter the way in which the significance of this is appreciated, it is considered that **no impact** upon significance would accrue following implementation.

6.0 Conclusion

- 6.1 This Draft Heritage Statement has been prepared on behalf of Mr. K.S Missan to accompany a full planning application relating to the installation of an access track from the eastern boundary of the application site to an existing area of hardstanding to the northeast, at Easthorpe Gardens, Flawforth Lane, Ruddington.
- 6.2 The presence of the proposed track would form an imperceptible addition within the immediate setting of Easthorpe House, wider setting of Ruddington Conservation Area, and the overarching Green Belt designation. In addition, the vast majority of the site would be retained as undeveloped, open space, and would maintain the sense of openness in relation to the setting of the House, stable black and animal pen. The result would be a **neutral** impact upon setting and significance.
- 6.3 Further, the referential width, materiality, reuse of existing areas of hardstanding, reinstatement of historic location of access, and provision of additional grassed areas, would ensure that the inherent interest and therefore significance of all heritage assets of relevance would be preserved. It is therefore considered that the scheme has paid special regard to the desirable objective of preserving or enhancing the setting of listed buildings and conservation areas. This is in accordance with Sections 66 & 72 of the 1990 Act. Furthermore, and with respect to the relevant policies within the NPPF, **no harm** is considered to accrue should the scheme be implemented.
- 6.4 With regards to all identified non-designated heritage assets of relevance, and again by virtue of the very minor nature of change that would be affected following implementation of the scheme, **no impact** is considered to accrue upon the significance of these. Fundamentally, the scheme here being assessed is of such a minor nature that it would **not fundamentally alter the way in which the site is appreciated**, nor would it alter the ability to appreciate the significance of all heritage assets of relevance.

APPENDIX 1

HERITAGE LEGISLATION, POLICY AND GUIDANCE SUMMARY

Planning (Listed Buildings & Conservation Areas) Act 1990

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

- Section 16(2) states “*In considering whether to grant listed building consent for any works the local planning authority or 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.*”
- 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 on land 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.*”

As the proposal does not involve an application for Listed Building Sections 16(2) does not apply in this instance.

National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) was revised in September 2023. With regard to the historic environment, the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that “our historic environments... can better be cherished if their spirit of place thrives, rather than withers.” The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.

This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a “*manner appropriate to their significance*” (Paragraph 189).

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 194).

Paragraph 195 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, “*to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal*”. This paragraph therefore 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.

Paragraph 198 states that local planning authorities should have regard to the importance of the retention '*in-situ*' of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.

Paragraph 199 requires that "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*"

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, "*clear and convincing justification*" (Paragraph 200). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to 'wholly exceptional' for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 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 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."*

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 202 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, where appropriate, securing its optimum viable use."

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

In the case of non-designated heritage assets, Paragraph 203 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.

The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

With regard to Conservation Areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. Whilst it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*

Broader design guidance is given in Chapter 12, ‘Achieving well-designed places’. The 2021 NPPF introduces the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect ‘local character’ in order to create *‘beautiful and distinctive places’* (paragraph 127).

Paragraph 134 states that significant weight should be given to development which reflects local design policies, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the ‘standard of design’ providing they conform to the ‘overall form and layout of their surroundings.

Planning Practice Guidance (PPG) (2019)

The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is 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.

In particular, the PPG notes the following in relation to the evaluation of harm: *“in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.”* (Ref ID: 18a-018-20190723).

This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a “high test”.

In relation to non-designated heritage assets, the NPPG explains the following:

“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.”

It goes on to clarify that: “A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”

This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England Conservation Principles: Policies and Guidance 2008

Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

“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” (page 59).



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

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

This advice note 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). 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)

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning Note 3 (Second Edition) (December 2017)

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 the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities' decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.

The advice in this document, in accordance with the NPPF, emphasises that the level of detail 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 the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Local Policy

Rushcliffe Local Plan

The Borough Council adopted the Local Plan Part 1: Core Strategy on 22 December 2014. This document established the strategic approach to new development in the Borough.

Rushcliffe Local Plan Part 1: Core Strategy

Policy 11: Historic Environment

1. *Proposals and initiatives will be supported where the historic environment and heritage assets and their settings are conserved and/or enhanced in line with their interest and significance. Planning decisions will have regard to the contribution heritage assets can make to the delivery of wider social, cultural, economic and environmental objectives.*
2. *The elements of Rushcliffe's historic environment which contribute towards the unique identity of areas and help create a sense of place will be conserved and, where possible, enhanced with further detail set out in later Local Development Documents.*
3. *A variety of approaches will be used to assist in the protection and enjoyment of the historic environment including:*
 - a) *The use of appraisals and management plans of existing and potential conservation areas;*
 - b) *Considering the use of Article 4 directions;*

- c) *Working with partners, owners and developers to identify ways to manage and make better use of historic assets;*
 - d) *Considering improvements to the public realm and the setting of heritage assets within it;*
 - e) *Ensuring that information about the significance of the historic environment is publicly available. Where there is to be a loss in whole or in part to the significance of an identified historic asset then evidence should first be recorded in order to fully understand its importance; and*
 - f) *Considering the need for the preparation of local evidence or plans.*
4. *Particular attention will be given to heritage assets at risk of harm of loss of significance, or where a number of heritage assets have significance as a group or give context to a wider area.*

Paragraph 3.11.2 states that:

Heritage assets in Rushcliffe include Listed buildings (both religious and non-religious), Conservation Areas, Historic Parks and Gardens and Scheduled Ancient Monuments. The definition also covers assets which have not been designated and afforded protection by separate legislation, including historic trees. The significance of these 'un-designated assets' is a material consideration in determining planning applications as identified in national planning policy. The policy identifies some of the elements of the historic environment that have particular importance to Rushcliffe, but there are many more elements which contribute towards the identity of the Borough and help create a sense of place.

Rushcliffe Local Plan Part 2: Land and Planning Policies

Policy 28: Conserving and Enhancing Heritage Assets

1. *Proposals that affect heritage assets will be required to demonstrate an understanding of the significance of the assets and their settings, identify the impact of the development upon them and provide a clear justification for the development in order that a decision can be made as to whether the merits of the proposals for the site bring public benefits which decisively outweigh any harm arising from the proposals.*
2. *Proposals affecting a heritage asset and/or its setting will be considered against the following criteria:*
 - a. *The significance of the asset;*
 - b. *Whether the proposals would be sympathetic to the character and appearance of the asset and any feature of special historic, architectural, artistic or archaeological interest that it possesses;*
 - c. *Whether the proposals would conserve or enhance the character and appearance of the heritage asset by virtue of siting, scale, building form, massing, height, materials and quality of detail;*
 - d. *Whether the proposals would respect the asset's relationship with the historic street pattern, topography, urban spaces, landscape, views and landmarks;*
 - e. *Whether the proposals would contribute to the long-term maintenance and management of the asset; and*
 - f. *Whether the proposed use is compatible with the asset.*

Paragraph 9.13, in relation to non-designated heritage assets, states that:

In addition to these nationally recognised assets, the Borough also includes a large number of buildings, archaeological sites, monuments, gardens and spaces of local and regional importance. These non-designated heritage assets are not afforded any additional statutory protection, but they are material considerations in the planning process and receive the full weight of both local and national planning policies. Therefore, where development would affect a non-designated heritage asset or would result in its demolition or loss, a balanced judgement on the acceptability of the proposal will be made, having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 9.15 states that:

It must also possess at least two or more of the following qualities that contribute positively towards the amenities of its locality.

- a) *The building is the work of a particular architect or regional or local note;*
- b) *It has qualities of age, style, materials or any other characteristics which reflect those of at least a substantial number of buildings in the wider settlement;*
- c) *It relates by age, materials, or in any other significant way to adjacent listed building and contributes positively to their setting;*
- d) *Individually, or as part of a group, it serves as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of its growth;*
- e) *It has a significant historic association with established features of a settlement such as road layout, open spaces, a town park or a landscape feature; and*
- f) *The building has a landmark quality or contributions towards the quality of recognisable spaces, including exteriors or open spaces within a complex of public buildings.*

Ruddington Neighbourhood Plan

The Ruddington Neighbourhood Plan was adopted on 23 July 2021. Relevant policies from the Plan are as below:

Policy 10 – Conservation Area

Applications within or adjacent to the Conservation Area will be supported in principle only where they preserve or enhance its character or appearance and its heritage assets and follow the guidance stated within the Conservation Area Appraisal Management Plan.

Policy 11 – Non-designated heritage assets

Planning applications must take into account the impact of development on non-designated heritage assets in the village, seeking to protect and, where appropriate, enhance them.

*Proposals must demonstrate that they have considered guidance for proposals affecting non-designated assets and consulted the Conservation Area Appraisal Management Plan and the **Ruddington Design Guide**.*

Policy 12 – Views, vista, landmarks and gateways

*All new development should, where relevant, demonstrate how it protects and enhances key views, vistas, landmarks, and gateways, identified within the **Ruddington Design Guide**.*

Ruddington Design Guide (2021)

The Design Guide was published in draft in June 2021 by the Parish Council. The guide divides the village into 21 different character areas and provides an overview of each as a context for appropriate new development decisions. The site at Easthorpe Gardens is not included within the scope of the document or the character areas.

APPENDIX 2

METHODOLOGY

Heritage Assets

A heritage asset is defined within the National Planning Policy Framework 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)” (NPPF Annex 2: Glossary).

‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.

The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that “*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.*” (Paragraph: 039 Reference ID: 18a-039-20190723)

However, the PPG goes on to clarify that “a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”

Meaning of Significance

The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the “*aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups*” (Page 2, Article 1.2)

The NPPF (Annex 2: Glossary) also defines significance as “*the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.*”

The British Standards BS7913 (2013) notes that “the attributes that combine to define the significance of a historic building can relate to its physical properties or to its context. There are many different ways in which heritage values can be assessed.”

Significance can therefore be considered to be formed by a collection of values.

Assessment of Significance

It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 194 of the NPPF.

The Historic England document ‘Conservation Principles’ states that “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.”

The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.

- Understanding the fabric and evolution of the asset;
- Identify who values the asset, and why they do so;
- Relate identified heritage values to the fabric of the asset;
- 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 assets sharing similar values;
- Articulate the significance of the asset.

At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset’s significance. Historic England’s ‘*Conservation Principles*’ sets out a grouping of values as follows:

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.’* (Page 28)

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)

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)

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)

Historic England advice Note 12 notes that 'interest may be archeological, architectural, artistic or historic.

The British Standards set out a simpler approach which 'is to think of a historic building's significance as comprising individual heritage values'. These could include townscape characteristics, artistic value, educational value and identity or belonging amongst others.

It is therefore clear that value-based assessment should be flexible in its application. It is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of setting/context to significance

In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.

Historic England's Conservation Principles defines setting as "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."

It goes on to state that "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).

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.

The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.

There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established ‘James Semple Kerr method’ which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This ‘value hierarchy’ has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.

The first stage of our approach is to carry out a thoroughly-researched assessment of the significance of the heritage asset, in order to understand its value:

Table 1 Assessment of Significance

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ 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.
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Once the value/significance of an asset has been assessed, the next stage is to determine the assets ‘sensitivity to change’. Table 2 sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.

An asset’s sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that, according to Historic England The Setting of Heritage Assets – Planning Note 3, ‘change’ does not in itself imply harm, and can be neutral, positive or negative in effect).

Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

Table 2 Assessment of Sensitivity

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the ‘magnitude’ of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its 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 itself being considered as the asset.

Table 3 Assessment 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</p>

	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.
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 effect on baseline conditions but a slight adverse or beneficial impact.
Neutral	A change or effect which is neither adverse nor beneficial in impact.
Nil	No change in baseline conditions.

Summary of Assessment

Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is “*proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance*” as set out in Paragraph 194 of the National Planning Policy Framework.

Research Methodology

This Heritage Addendum is the result of a robust process which assesses relevant documentary research (including HER records, maps, drawings and reports, as well as archive material where relevant) and professional judgment.



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