

Appendix 3: Methodology for Historic Environment

Gloucestershire Historic Environment Assessment Methodology

The Historic Environment has been subject to a high level assessment undertaken with reference to the following policy and guidance:

- Ministry of Housing, Communities and Local Government. 2019. National Planning Policy Framework;
- Ministry of Housing, Communities and Local Government. 2019. Planning Practice Guidance;
- Chartered Institute for Archaeologists. 2017. Standard and guidance for historic environment desk-based assessment;
- Historic England. 2018. Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition);
- Historic England. 2015. Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking; and,
- Historic England. 2015. The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3.

Data

The following spatial data forms the basis of the historic environment analysis:

- Historic England (HE) designated asset datasets:
 - Listed Buildings;
 - Scheduled Monuments;
 - Registered Parks and Gardens; and
 - Registered Battlefields;
- Gloucestershire Historic Environment Record (HER) data;
- Gloucestershire Historic Landscape Characterisation (HLC) data (in draft);
- Gloucester City Council (GCC), Cheltenham Borough Council (CBC), Tewkesbury Borough Council (TBC) and Stroud District Council (SDC) Conservation Areas, and Cheltenham Borough Council local list¹; and
- Digital historical mapping (although a systematic review to identify further heritage assets has not been undertaken as it is beyond the scope of this study).

Assessment

Using the baseline heritage asset datasets, a rapid intersection analysis has been undertaken to:

- Identify heritage assets with the potential to be directly affected by development within the search areas;
- Identify heritage assets that could experience effects to their significance as a result of setting change as a consequence of development. This was based on two complementary approaches:

¹ Cheltenham Council is the only authority to have a local list covering the whole region; there is no accompanying information on the buildings so understanding their setting sensitivity is not possible and – for the purposes of this assessment – it has simply been assumed that they may be susceptible to meaningful change. Stroud District has a local list for the town centre only, which is not an area of search. Gloucestershire City Council has a local list in preparation.

- a simple proximity calculation to identify assets in the vicinity of the search areas; and
 - a rapid review of the heritage asset data to identify assets / asset classes likely to have vulnerable settings.
- Identify the historic character of the proposed sites.

The potential effect upon the significance of heritage assets should the search area be developed was then appraised. This focused on effects to the significance of the asset in line with NPPF and considered:

- a. The significance and sensitivity of the asset; and
- b. The potential impact of the development upon the asset.

Assessment of effects relating to setting change followed the stages set out in HE guidance (Good Practice in Planning Advice Note 3), albeit at a strategic level as the exact form of development (incl. scale, massing, orientation) cannot be known at this juncture.

The following principles were applied in the judgement of effect levels:

Risk of effect	Criteria
Significant Negative Effect	Heritage asset is of high or medium significance and the magnitude of effect is likely to harm its significance.
Minor Negative Effect	Asset is of low significance and the magnitude of effect is likely to harm its significance.
Negligible or No Effect	Asset is of high, medium or low significance and the magnitude of effect is unlikely to harm the significance of the asset.

Assumptions and limitations

Assumptions

- It has been assumed that any listed buildings in the assessment areas would not be subject to any physical change at all in order to comply with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. No such assumption has been made in relation to setting change.
- It has been assumed that non-designated assets of low (local) value do not typically represent an absolute constraint to development and may have the potential to be 'preserved by record'. Effects to non-designated assets of more than local significance - e.g. regional or national - may be constrained and require preservation in situ.
- The study has utilised a range of sources on the area's historic environment. Much of this is necessarily secondary information compiled from a variety of sources (e.g. Historic Environment Record (HER) data). It has been assumed that this information is reasonably accurate unless otherwise stated.
- The study provides a strategic assessment of the risk of harm to heritage assets arising from development within the study area. As detailed proposals for the sites are not available, the assessment cannot draw conclusive statements regarding the significance of the potential impacts or definitive levels of harm. More detailed assessments would need to be undertaken as part of any subsequent site allocation and/ or planning applications.

Limitations

- Non-designated assets have only been identified from the HER and available local lists², it is likely that further heritage assets would be identified from desk-based research and site visits. The identification of further heritage assets may alter the predicted level of effects and any suggestions for locating development to avoid/ minimise harm. In particular, a number of historic farms – and their agricultural settings - are likely to be of local importance.
- Cheltenham Council is the only authority to have a local list covering the whole of its region; there is no accompanying information on the buildings so understanding their setting sensitivity has not possible and – for the purposes of this assessment – it has simply been assumed that they may be susceptible to meaningful change.
- Any development carries the risk of encountering unexpected archaeological remains. Given the rural nature of many of the search areas, limited numbers of known archaeological assets are likely to represent an absence of investigations rather than an absence of archaeology. The absence of evidence is not the same as evidence of absence and hitherto unrecorded archaeology may be present.
- Potential effects to setting are desk-based only and have not been tested in the field.
- Due to the high-level nature of the assessment no consideration has been given to mitigation options or the opportunity to enhance the significance of heritage assets. This would need to be considered in the next stage of assessment to ensure – in line with the NPPF - that an active strategy is being pursued towards the management of the historic environment.

² Cheltenham Council is the only authority to have a local list covering the whole region. Stroud District has a local list for the town centre only. Gloucestershire City Council has a local list in preparation.