

East Devon Local Plan 2020 – 2042 Historic Environment Site Assessment (HESA)
Methodology¹

Step 1 identify any heritage assets potentially affected ²	
Is the site within 100 metres of a designated heritage asset?	
Could development of the site affect any heritage asset (designated or non-designated) or its setting? ³	
List any heritage assets potentially affected. ⁴	

Step 1 will conclude by assessing the impact on the historic environment of developing the site as either high, medium, or low. A more detailed assessment will be undertaken for sites that are being chosen to allocate, by following Step 2, 3 and 4 below. This is a proportionate approach to ensure the impact upon heritage assets is considered in more detail for site allocations, that reflects the consultation response from Historic England on the Draft Local Plan, published November 2022.

Step 2 Existing contribution of site to significance of heritage asset	
Heritage asset 1	
Description of asset ⁵	
Significance of asset and setting ⁶	
Relationship of site with heritage asset ⁷	
Level of contribution (site to heritage asset) ⁸	None/little/moderate/significant/highly significant
Further assessment required? ⁹	
Heritage asset 2	
Description of asset ⁵	
Significance of asset and setting ⁶	
Relationship of site with heritage asset ⁷	
Level of contribution (site to heritage asset) ⁸	None/little/moderate/significant/highly significant
Further assessment required? ⁹	

¹ This methodology is based on [The Historic Environment and Site Allocations in Local Plans | Historic England](#)

² Check Devon Historic Environment Records [Devon County Council Environment Viewer](#)

³ Refer to Killerton and A la Ronde setting studies.

⁴ If no heritage assets are affected the assessment does not proceed to Stage 2.

⁵ Summarise key points from listing [Search the List - Find listed buildings, monuments, battlefields and more | Historic England](#)

⁶ What is the significance of the heritage asset and its setting? Include the physical surroundings, the experience of the asset and any cultural associations. Take a proportionate approach, tailoring the detail to the relative importance of the asset.

⁷ Consider proximity, inter-visibility and other relationships such as noise.

⁸ Consider the experience of the asset in its physical surroundings and its associations (cultural and intellectual)

⁹ Is additional information required to complete the assessment? If so specify what is required.

Step 3 Identifying potential impact on significance of heritage asset	
Heritage asset 1	
What impact would development have on the heritage asset and its setting? ¹⁰	
Could the site be developed in a way that minimised potential impact? ¹¹	
Would the development affect the heritage asset in other ways? ¹²	
Heritage asset 2	
What impact would development have on the heritage asset and its setting? ¹⁰	
Could the site be developed in a way that minimised potential impact? ¹¹	
Would the development affect the heritage asset in other ways? ¹²	

¹⁰ Consider proximity, topography, key views.

¹¹ Consider restricting developable areas, height of buildings, maintaining key view.

¹² Consider lighting, noise, landscape context, increased traffic and other secondary affects.

Step 4 How to maximise enhancements and avoid harm	
Heritage asset 1 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	
Would development enable further research and recording of the heritage asset?	
Would development enable better revealing of the significance of the heritage asset?	
Would development enable the asset to be removed from the at risk register?	
Heritage asset 1 avoiding harm	
Are there reasonable alternative sites?	
Could the site boundary be changed to avoid harm?	
Could the amount of development be reduced to avoid harm?	
Would a different type of development (use) avoid harm?	
Could design avoid harm?	
Heritage asset 2 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	
Would development enable further research and recording of the heritage asset?	
Would development enable better revealing of the significance of the heritage asset?	
Would development enable the asset to be removed from the at risk register?	
Heritage asset 2 avoiding harm	
Are there reasonable alternative sites?	
Could the site boundary be changed to avoid harm?	
Could the amount of development be reduced to avoid harm?	
Would a different type of development (use) avoid harm?	
Could design avoid harm?	

Step 5 from the Historic England site allocations guidance will form part of the 'site selection' process

Scoring criteria

The Site Selection report will summarise the findings of the HESA, identifying the impact of allocating the site on the historic environment as either:

- High: significant effect predicted. Mitigation unlikely to be possible.
- Medium: no significant effects which cannot be mitigated.
- Low: no concerns identified on current evidence, although archaeological mitigation measures may be required.

Further guidance on these scoring criteria is set out in the following table.

Overall impact	Explanation
High	An impact that would compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished and compromised. This would involve a loss of significance that could not be resolved through mitigation.
Medium	An impact is predicted, but would not compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished or compromised. Mitigation may make the impact acceptable. The overall significance of the asset would not therefore be materially changed.
Low	No impact upon an asset is predicted or, if an impact is predicted, the cultural heritage value of the asset(s) would be unaffected.



Historic England

The Historic Environment and Site Allocations in Local Plans

Historic England Advice Note 3



Summary

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

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www.HistoricEngland.org.uk/advice/planning

Front cover: Exeter from the air

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

Introduction

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

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

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

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

Site Allocation Process

Stage 1: Evidence Gathering

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

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

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

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

Stage 2: Site Selection

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

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

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

Stage 3: Site Allocation Policies

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

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

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

Site Selection Methodology

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

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

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

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

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

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

STEP 4 Consider maximising enhancements and avoiding harm through:

Maximising Enhancement

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

Avoiding Harm

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

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

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

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

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