

CHAPTER 9: BUILT HERITAGE

9.1 INTRODUCTION

- 9.1.1 This chapter of the ES has been produced by Cotswold Archaeology to assess the Proposed Development in relation to the effects it would have upon built heritage. The built heritage resource which may be affected by the Proposed Development includes designated and non-designated heritage assets located within the Site and in its surroundings.
- 9.1.2 The chapter describes: the assessment methodology; the baseline conditions currently existing at the Site and in the surrounding area; the likely significant environmental effects; the mitigation measures required to prevent, reduce or offset any significant adverse effects; the likely residual effects after these measures have been employed; and the cumulative effects associated with the Proposed Development in combination with other committed schemes. This chapter is supported by a heritage desk-based assessment which forms Appendix 9.1, in Volume 2 of this ES (Cotswold Archaeology 2020).

9.2 ASSESSMENT CRITERIA & METHODOLOGY

Previous Assessment

- 9.2.1 The northern and southern parts of the Site were previously subject to two separate outline planning applications for mixed use developments, with permission granted in November 2017 (O/16/79354) and December 2017 (ref. O/14/75735), respectively. As part of these applications, a Heritage Statement and Built Heritage ES Chapter were prepared. An overarching Heritage Desk-Based Assessment (DBA), discussing the archaeology and built heritage resource within the Site has been prepared and forms Appendix 9.1 of this ES. As part of the DBA, a site visit and historic building assessment have been carried out.

Scoping Opinion

- 9.2.2 A Scoping Report was submitted to Eastleigh Borough Council on 20 April 2020 and a Scoping Opinion was received on 12 August 2020. The Scoping Opinion makes clear that the ES should contain a thorough assessment of the likely effects which the Proposed Development might have upon the significance of built heritage assets, including the Grade II Listed Firtree Farmhouse. It states that the ES should consider embedded mitigation measures to avoid and minimise harm to built heritage assets, the nature and design of any mitigation measures, and identify any opportunities for securing wider benefits for the future conservation and management of heritage assets. Specifically, it states that the assessment

should also take account of the potential impacts which may arise in relation to associated activities, such as construction, servicing and maintenance, and associated traffic.

- 9.2.3 The comments raised in the Scoping Opinion are appropriately addressed within this ES chapter.

Legislative Context

- 9.2.4 The *Planning (Listed Buildings and Conservation Areas) Act 1990*¹ states that ‘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 that it possesses’ (Section 66).

Planning Policy and Guidance

National Planning Policy

- 9.2.5 The *National Planning Policy Framework Section 16: Conserving and enhancing the historic environment* (NPPF)² is the principal national guidance on the importance, management and safeguarding of the historic environment recourse within the planning process. The aim is to ensure that Local Planning Authorities (LPA), developers and owners of heritage assets adopt a holistic and consistent approach to conserving the historic environment.
- 9.2.6 Heritage assets include designated and non-designated sites, and policies within the NPPF relate to both the treatment of heritage assets themselves, and of their settings, both of which are a material consideration in development decision making. LPA are urged to request applicants to describe the significance of any heritage assets affected by a scheme, including any contribution made by their setting. The level of detail required should be proportionate to the importance of the assets, and no more than sufficient to understand the potential effects of the proposal on their significance.
- 9.2.7 The key tenets of the NPPF are that:

¹ ‘Planning (Listed Buildings and Conservation Areas) Act 1990’, Act of UK Parliament

² Ministry of Housing and Local Government (2019); National Planning Policy Framework

- 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. The more important the asset, the greater the weight should be (Paragraph 193);
- significance can be harmed or lost through alteration or destruction of an asset or development within its setting. Any harm or loss to the significance of designated assets should require clear and convincing justification. Substantial harm to, or loss of, a Grade II listed building, park or garden should be exceptional. Substantial harm to, or loss of, designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, Grade I and II* listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional (Paragraph 194);
- where proposed development 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 (Paragraph 196); and
- with regard to non-designated heritage assets, a balanced judgement will be required having due regard to the scale of any harm or loss, and to the significance of the heritage asset affected (Paragraph 197).

Local Planning Policy

Current Planning Policy

9.2.8 The current planning policy within the Eastleigh Borough Council comprises the saved policies of the Eastleigh Borough Local Plan Review 2001-2011³, which was adopted in 2006. Policies of relevance to the protection of heritage assets include:

- Policy 174.LB – Listed Buildings Alterations, which pertains alteration or development within the curtilage of a Listed Building, including where development may have detrimental impact on the building's setting;

³ Eastleigh Borough Council 2006 Eastleigh Borough Local Plan Review (2001-2011) - <https://www.eastleigh.gov.uk/planning-and-building/planning-policy-and-implementation/local-plan/local-plan-2001-2011>

- Policy 175.LB – Buildings of Local Importance, which states that development which would have a detrimental impact on a building of local importance or its setting will not be permitted.

9.2.9 It should be noted however, these policies do not apply to any buildings within the Site (i.e. no Listed Buildings or Buildings of Local Importance are located within the Site).

Emerging Planning Policy

9.2.10 The Council is preparing a new local plan for the Borough, which was submitted to the Secretary of State for formal examination on 31 October 2018. The emerging policy of heritage relevance, contained within the submitted Local Plan 2016-2036 (July 2019)⁴, comprises Policy DM12: Heritage Assets. This states that development of a heritage asset or within its setting will be permitted, provided *'it does not harm or detract from the significance or special interest of the asset, and sustains and enhances its special character and qualities'* and meets other criteria, where relevant. The policy also requires for a heritage statement to be submitted with the planning application.

9.2.11 In addition, Policy HH1: Land west of Horton Heath of the submitted Local Plan requires that development at Horton Heath should follow a set design principles and a high-level design code which ensure *'...a layout of development within and around the Chalcroft Farm complex and Firtree Farmhouse that retains and enhances the heritage and architectural value of buildings and landscape features...'*

Guidance/ Best Practice

9.2.12 Preparation of the DBA and ES chapter has been informed by the following guidance documents:

- *NPPF Planning Practice Guidance: Historic environment*⁵ (updated July 2019). This provides further guidance on the policies within the NPPF, including the assessment of significance and the judgement left to the decision maker of whether the proposal would result in substantial harm. In the assessment of harm, it is stated that *'the*

⁴ Eastleigh Borough Council 2019 Submitted Eastleigh Borough Local Plan (2016-2036)
<https://www.eastleigh.gov.uk/media/5713/ed33-submitted-ebbp-track-change-mods-agreed-delegated-signoff-version.pdf>

⁵ Ministry of Housing, Communities and Local Government (2019) National Planning Practice Guidance: Historic Environment

degree of harm to the asset's significance rather than the scale of development' needs to be assessed;

- Chartered Institute for Archaeologists' (CIfA) *Standard and Guidance for Historic Environment Desk-Based Assessment*⁶ defines good practice for the execution and reporting of desk-based assessments, in line with other regulations and Code of Conduct of the CIfA;
- Historic England guidance *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*⁷ sets out approaches to making decisions about the historic environment in England. The assessment of significance is based upon the following criteria: evidential value, historical value, aesthetic value and communal value;
- Historic England's *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking*⁸ provides further information on good practice in implementing historic environment policy, including advice on the assessment of significance of heritage assets in support of applications;
- Historic England's *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*⁹ includes guidance on setting and development management, including assessment of the implications of proposals, and recommends a stepped approach for assessing the impacts; and
- Historic England's *Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets*¹⁰, which provides advice with regard to the NPPF

⁶ Chartered Institute for Archaeologists (2020) *Standard and Guidance for Historic Environment Desk-Based Assessment*

⁷ English Heritage (2008) *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*

⁸ Historic England (2015) *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment*

⁹ Historic England (2017) *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)*

¹⁰ Historic England (2019) *Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets*

requirement for applicants to describe heritage significance and help understand potential impacts of the proposal with regard to change to heritage assets.

Baseline Data Collection

9.2.13 As part of the DBA (Volume 2, Appendix 9.1), the following sources of heritage information were consulted:

- National Heritage List for England, for designated heritage assets, such as Listed Buildings and Scheduled Monuments;
- Hampshire and Winchester City Historic Environment Records, for records of archaeological discoveries and heritage assets;
- Historic England Archive, for database of any further records of archaeological discoveries and heritage assets and aerial photographs;
- Documentary sources and historic mapping relevant to the historic development of the Site, available at Hampshire Record Office and online;
- Environment Agency LiDAR imagery;
- On-line sources, including British Geological Survey, and previous reports; and
- A Site visit, which was initially undertaken on 6 November 2018. Further site visits were undertaken on 17 June 2020 and 5 August 2020 to allow detailed assessment of Grade II Listed Firtree Farmhouse and its setting.

9.2.14 Further information with regard to the methodologies utilised to produce the DBA and ES baseline is contained ES Volume 2, Appendix 9.1.

Assessment Methodology

Assessment of Significance of Heritage Assets

9.2.15 A heritage asset is defined by the NPPF as *'a building, monument site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*

9.2.16 Heritage significance is defined as the value of a heritage asset to this and future generations because of their heritage interest. That interest may be archaeological, architectural, artistic or

historic in nature. The assessment of significance within this Chapter has been guided primarily by the key industry-standard policies and guidance contained in Conservation Principles, where it is described with reference to the following four key forms of value:

- **Evidential value:** derived from the potential of a place to yield evidence about past human activity. It is primarily associated with the physical remains or the historic fabric of an asset. This value is proportionate to the potential of the asset to contribute to the understanding of the past. When there are no written records, physical remains, i.e. archaeological deposits, may provide the only source of information about the past.
- **Historical value:** derived from the ways in which past people, events and aspects of life can be connected through a site to the present. It can be illustrative (where asset can provide links and insights into past communities and their activities) or associative (related to the association of an asset with a notable historic family, person, event or movement).
- **Aesthetic value:** derived from the ways in which people draw intellectual and sensory stimulation from a place, developed either through conscious design or as a result of the fortuitous evolution of the place over time. It may include the asset and its setting.
- **Communal value:** derived from the meaning of a place for the people. The commemorative and symbolic aspects reflect the meanings of an asset for the people who draw part of their identity from it or have emotional links to it (such as memorials). The social aspect is associated with places perceived as source of identity or distinctiveness and spiritual value is attached to places of worship.

9.2.17 Significance derives not only from a heritage asset's physical fabric, but also from its setting. The setting of a heritage asset is defined as the surroundings within which it is experienced; its extent is not fixed and may change as the asset and its surroundings evolve. However, setting is not a heritage asset in its own right, nor is it a heritage designation in its own right. Its importance lies in what it contributes to the significance of the heritage asset. This contribution may be positive, negative or neutral (i.e. does not contribute to the asset's significance).

9.2.18 Paragraph 189 of the NPPF is clear in its recognition of the need for local planning authorities to require an Applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. It is also unequivocal on the matter of scope, as it mentions that the level of detail should be proportionate to the importance of the asset, and no more than sufficient to understand the potential impact of a development on that significance.

- 9.2.19 The way in which heritage significance is expressed within this ES Chapter has been specifically developed, based on good practice, to ensure that it is fully aligned with the Planning (Listed Buildings and Conservation Area) Act 1990, the NPPF and “Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment.
- 9.2.20 The statements of significance developed for each of the assets reflect the language of the Planning Act 1990, utilising terms such as ‘character and appearance’ (of Conservation Areas), and ‘architectural and historic interest’ (of Listed Buildings). Further frames of reference, found within Conservation Principles, allow for terms such as ‘evidential’, ‘historical’, ‘aesthetic’ and ‘communal’ to be used to convey the many heritage values that combine to make up the heritage significance of an asset.
- 9.2.21 The statements of significance describe ‘what matters and why’, i.e. which aspects of an asset and its setting contribute to the heritage significance of the asset and how. Although the statements rightly acknowledge the fabric of heritage assets as representing the principal embodiment and physical manifestation of their heritage significance, the surroundings of the assets, and the ways in which they can be experienced, often contribute to their overall significance. This will be assessed in line with the settings assessment methodology (ES Volume 2, Appendix 9.1).
- 9.2.22 Although terms such as High, Medium or Low value, and National, Regional or Local importance are often adopted in EIA to express a summary description of the ‘relative significance’ heritage assets, they are not universally recognised or accepted terms within heritage sector guidance and amongst heritage professionals. This is because these concepts require complex definitions to properly allow for their application, and do not directly relate to the language or key tests required in determining planning applications or heritage consents.
- 9.2.23 The criteria adopted for this ES Chapter are laid out in **Table 9.1**, with terminology used derived directly from the NPPF. The language used in this ES Chapter is entirely consistent with the NPPF and the Planning Act 1990, and provides the decision-maker with sufficient information to understand how change could bring benefit or harm to the heritage significance of an asset(s), thus enabling an informed judgement to be reached.

Table 9.1: Criteria for Assessing the Significance of Heritage Assets

Heritage significance	Description of Criteria
Designated heritage assets of the highest significance	As defined in the NPPF, these include: Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, and World

	Heritage Sites. Heritage assets displaying considerable evidential, historic, aesthetic or communal value, as identified by Conservation Principles, which are of comparable significance to designated heritage assets of the highest significance (including assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments), would also fall within this category.
Designated heritage assets of less than highest significance	In accordance with the NPPF, these include Grade II Listed Buildings and Grade II Registered Parks and Gardens. Although not mentioned specifically, Conservation Areas are considered to fall within this category as they are not listed as of highest significance.
Non-designated heritage assets	This includes archaeological remains, built heritage or historic landscape features which are not designated, but which display evidential, historic, aesthetic or communal values, as identified by Conservation Principles, and thus have a degree of significance meriting consideration in planning decisions on the basis of their heritage interest. The July 2019 revision of the Planning Practice Guidance defines non-designated heritage assets as those identified as such in publicly accessible lists or documents provided by the plan-making body. Where these sources do not specifically define assets as non-designated heritage assets, they will be referred to as heritage assets for the purpose of this ES. The assessment of non-designated heritage assets and heritage assets will be equivalent in this ES, in line with industry standards and guidance on assessing significance and impact. They may not, however, carry equivalent weight in planning as set out within the provisions of the NPPF.
Uncertain	Heritage assets, the significance of which has not yet been ascertained.
Negligible	Remains that do not have sufficient significance to warrant consideration in planning decisions, and which are therefore not considered to constitute heritage assets.

Assessment of Effects of the Proposed Development

9.2.24 The methodology presented here moves away from the more traditional ‘scalar’, quantitative, matrix-led approach, adopting a descriptive, qualitative presentation of the findings of the assessment. This is because the descriptions of anticipated Proposed Development impacts upon heritage assets are qualitative rather than quantitative and the adopted approach allows for greater accuracy in understanding the potential harm the Proposed Development may cause to the significance of heritage assets. As with the approach adopted in assessing heritage significance of heritage assets, this approach directly reflects key concepts in planning policy and heritage guidance with regard to the assessment of Proposed Development effects upon heritage assets. It therefore offers an appropriate way to define such effects. Clear statements of significance (the ‘what matters and why’ approach), and a sound understanding of the character of the Proposed Development, as presented in this

assessment methodology, allow for a transparent articulation of the nature/degree of any identified impacts.

9.2.25 The effects of the Proposed Development arise as a result of change (impact) to the heritage assets. The significance of a heritage asset can be harmed or lost through alteration, destruction or development within its setting. In terms of harm though changes to setting, as clearly illustrated within the NPPF, any attempt to convey the impact or harm of a development has to be framed within the tightly defined parameters of harm to the significance of the heritage asset itself. This is a fundamental principle. In summary, a project could bring about change within the setting of a heritage asset, resulting in harm to its significance, or the way in which that significance is experienced. References such as 'harm to setting' are therefore avoided.

9.2.26 The assessment of the effect of the Proposed Development upon cultural heritage resource takes into account numerous factors, including the scale of development, the type and extent of physical disturbance and the visual effects. Proposed Development impacts may be:

- Direct or indirect. Direct impacts arise from physical change to the resource, which affects its physical remains or fabric (i.e. alterations to historic buildings). Indirect impacts relate to changes within the setting of heritage assets.
- Permanent or temporary. Due to their character, direct impacts upon the physical remains of heritage assets are permanent, and not reversible. However, impacts on the settings of heritage assets may be temporary, if the Proposed Development has a limited lifespan. These temporary effects can be short, medium or long-term.
- Beneficial, when the Proposed Development leads to the enhancement of the heritage resource, or adverse, when it results in harm to, or loss of, the significance of a heritage asset. If the resource will not be affected by the Proposed Development, there will be no impact.

9.2.27 To further assist in the decision-making process, the following approach to the assessment of effects upon heritage assets (**Table 9.2**) is adopted. This has been done in order to improve the intelligibility of the assessment results for purposes of quick reference and ready comprehension. The language used here is entirely consistent with the NPPF and the Planning Act 1990, and provides sufficient information to reach informed judgement.

Table 9.2: Levels of Effects upon Heritage Assets

Level of Effect	Description	Applicable policies
Heritage benefit	The proposals would enhance the heritage significance of a heritage asset.	Enhancing the significance of a heritage asset is a desirable Application Scheme outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF paragraphs 185, 192 and 200
No harm	The proposals would preserve the significance of a heritage asset.	Preserving a Listed Building and its setting is consistent with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Sustaining the significance of a heritage asset is consistent with paragraph 185 of the NPPF and should be at the core of any material local planning policies in respect of heritage.
Less Than Substantial Harm	The proposals would be anticipated to result in a restricted level of harm to the significance of a heritage asset, such that the asset's contributing heritage values would be largely preserved (lower end). The proposals would lead to a notable level of harm to the significance of a heritage asset. A reduced, but appreciable, degree of its heritage significance would remain (upper end).	In determining an application, this level of harm with regard to designated heritage assets (of highest and less than highest significance) should be weighed against the public benefits of the proposals, as per paragraph 196 of the NPPF. Proposals involving change to a Listed Building or its setting, or any features of special architectural or historic interest which it possesses, must also be considered within the context of the Planning Act 1990. With regard to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 197 of the NPPF.
Substantial Harm	The proposals would very much reduce the designated heritage asset's significance or vitiate that significance altogether	With regard to designated heritage assets, Paragraphs 194 and 195 of the NPPF would apply. These state that substantial harm or loss to designated heritage assets of the highest significance should be wholly exceptional and to assets of less than highest significance – exceptional. Application Scheme leading to such harm should be refused unless it is demonstrated that this substantial harm is necessary to achieve substantial public benefits. The Planning Act 1990 may also apply. In relation to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 197 of the NPPF.

9.2.28 In this approach to the EIA, the extent of the effects identified is defined through appropriate description of the anticipated degree of harm upon any sensitive heritage receptors. Such descriptions will define whether the effects will affect the assets or their settings and assess, if assets are affected directly, whether the assets are to be wholly or partly removed. Professional judgement is used to ascertain the significance of effect on the sensitive heritage assets, taking into account the heritage significance of the assets as well as the identified effects and their extent.

9.2.29 The approach to the assessment of the significance of effect, in EIA terms, with regard to heritage assets, is defined as follows:

- In line with EIA best practice, it is considered that ‘substantial harm’ to designated heritage asset would equate to a **Substantial or Major Adverse (significant) Effect** in line with the language used within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017;
- ‘Less than substantial harm’ to designated heritage assets could also trigger the same significant effect, resulting in **Major or Moderate Adverse (significant) Effect**, but no prescriptive criteria are proposed to prejudge this threshold, leaving it to professional judgement as this will be dependent on the extent of harm and its effect on the significance of the asset. Where effects on the heritage assets are limited, this harm would result in **Minor Adverse Effect (not significant)**.
- With regard to the harm to non-designated assets, professional judgment will be used to ascertain whether the significant effect (i.e. **Major or Moderate Adverse (significant) Effect**) is triggered, taking into account the relative significance of such assets as well as the level of harm upon them.
- No harm to designated or non-designated heritage assets would result in a **Neutral (not significant) Effect**.
- Where heritage benefits are identified (to designated or non-designated heritage assets), professional judgement will be used to ascertain the significance of the effect.

Geographical Scope

9.2.30 As part of the DBA, a 1km study area, drawn around the boundary of the Site, was adopted as this is considered sufficient to provide the necessary context for understanding the heritage significance in respect of the Site. Designated heritage assets located within the Site and the study area were considered, as well as several non-designated (locally listed) assets. Further

detail was obtained for the Site itself, including a review of historic maps, focused on the Site, and assessment of historic buildings within the Site, including the Grade II Listed Firtree Farmhouse.

Temporal Scope

9.2.31 Potential effects of the Proposed Development upon heritage assets are assessed in relation to temporary and permanent impacts. Any direct impacts upon heritage assets (which are likely to occur during the construction phase) would be permanent as these would lead to a permanent change to an asset. Indirect impacts (i.e. change within the setting) would be temporary during the construction phase, and permanent during the operation phase.

Assumptions & Limitations

9.2.32 The baseline assessment has been informed by secondary information derived from a variety of sources, only some of which have been directly examined for the purpose of this assessment. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

9.2.33 Reasonable internal and external access was provided to Firtree Farm to allow for an assessment of its significance, and external access was available for Victoria House.

9.3 CONSULTATION

9.3.1 As stated above, a consultation response in relation to built heritage was received as part of Eastleigh Borough Council's Scoping Opinion. This highlighted the Grade II Listed Firtree Farmhouse within the Site and other listed buildings nearby as being potentially sensitive to development within their settings.

9.4 BASELINE ENVIRONMENT

Introduction

9.4.1 This section of the ES Chapter presents a summary of the built heritage resource within the OPA Phase 1 Site and the Wider OPA Site and its surroundings. Further detail is presented in the Heritage Assessment in ES Volume 2, Appendix 9.1.

OPA Phase 1

9.4.2 The built heritage resource concerning the OPA Phase 1 Site is very limited. A number of Grade II Listed Buildings are situated within the wider surrounding landscape, with the nearest comprising Moorgreen Farmhouse and an associated granary, c. 870m to the south-west

(Appendix 9.1, Figure 4). These assets are effectively screened from the Site by the Chalcroft Business Park and railway embankments, and do not share any visual or experiential associations with the Site. The DBA (Appendix 9.1) determined that the Proposed Development would not alter the setting, or affect the significance of these Listed Buildings, or any additional heritage assets within the wider landscape. These were therefore scoped out of further assessment, and no sensitive receptors have been identified in relation to OPA Phase 1.

Wider OPA

9.4.3 This section focuses primarily upon the Grade II Listed farmhouse at Firtree Farm. The farmstead buildings to the south, now known as Victoria House, are a modern replacement of historic structures. This is discussed only in so far as it contributes to the setting of Firtree Farm. Within the Site boundary there are (or were) a further two historic (non-designated) farmsteads which have been scoped out from further assessment: Foxholes Farm, which has been demolished as part of a consented Prior Notification of Demolition; and Chalcroft Farm, which is subject to a separate application for demolition.

9.4.4 The settings of designated and non-designated heritage assets within the surrounding landscape are also discussed.

Firtree Farmhouse

9.4.5 A detailed assessment of Firtree Farmhouse is provided in the DBA which forms Appendix 9.1 of this ES. The historic development, setting, and significance of the building are described in brief below.

Historic development

9.4.6 The Grade II Listed Firtree Farmhouse (Appendix 9.1: Figure 4) is situated within the Site, to the north of Firtree Lane. The farmhouse was constructed in the 18th century, and is of two storeys in height with redbrick walling in Flemish and Monk bond. It has a hipped roof which was replaced in the early 19th century. A late 19th century extension adjoins the building to the rear.

9.4.7 As detailed within the historic map regression presented within the DBA, the farmstead is depicted on Milne's map of 1791, along with Foxholes Farm and Chalcroft Farm, and underwent a number of changes over the course of the 19th century, including enlargements to the farmhouse and the addition of a barn and additional buildings the farmyard in c. 1830. The farmhouse is suggested to have been rebuilt in 1897, with a number of late Victorian

features. A secondary access was introduced from Firtree Lane sometime after c. 1895, and by the time of the Third Edition OS Map in 1909, the gardens had been subdivided.

- 9.4.8 Further development of the farmyard occurred throughout the 20th century, including the construction of cattle sheds to the south of the yard by the 1960's, and the removal of outbuildings at the eastern edge of the yard. By 1985 the farm had shifted north-west, housed in a number of large sheds that had been built on the northern side of Firtree Lane, followed shortly later by a new dwelling built to serve the repositioned farm. The farmhouse had been subdivided by this time, with the southern wing named as Firtree Farmhouse Cottage, a small stable block added within a large paddock to the north and a stand-alone garage constructed for the cottage. This is largely as Firtree Farmhouse survives today.

Farmstead assessment

- 9.4.9 The Listed farmhouse shares a close visual relationship with the former farmyard, now known as Victoria House. Somewhat unusually, the farm buildings are separated from the farmhouse across Firtree Lane, with the farmhouse facing away from the farmyard, implying a high status to the building. As a result of the extensive modifications to the farmhouse, unsympathetic rebuilding of the historic farm buildings as Victoria House and shift in location of the farmstead to the northern side of Firtree Lane, the functional relationship between the historic Firtree Farmhouse and the farm buildings has been severed, and the farmstead function as a whole at Firtree Farm is now lost.
- 9.4.10 Together with Lake Farm, Allington Manor Farm, Foxholes Farm and Chalcroft Farm (among others), Firtree Farm correlates with the wider pattern of development locally and regionally of isolated farmsteads in the area. As seen today, the layout of the farmyard is the product of late-19th century developments, and the shift to dairy farming in the inter-war period. On the basis that the buildings at Victorian House are all modern replacements, however, the barns should not be considered heritage assets in their own right. At most, these visually contribute to legibility of a farmstead here on the basis of the agricultural-style character and courtyard layout of the rebuild, however they do not contribute to the significance of the farmhouse or the farmstead.

Significance of Firtree Farmhouse

- 9.4.11 Situated in a rural position, Firtree Farmhouse retains highly attractive architectural features, principally from the 19th century, which project its evolution and incorporate elements of an earlier building as a subservient wing. The property sits behind a low wall obscured from the road by verdant hedging, with a forecourt fronting to the east accessed via a gated entrance, which gives it a sense of seclusion within its private gardens. The private grounds to the north

are more informal, and the whole garden is well-screened by trees with occasional glimpses of agricultural fields beyond. The orientation of the building combined with the qualities of its garden and distinct separation from the farmstead to the south combine to portray the image of a high status and polite 'country house'.

- 9.4.12 The significance and special interest of Firtree Farmhouse derives to a substantial degree from the readable multi-phased historical construction and its adaption as a refined country house, the quality of its architecture, particularly the east wing and principal elevation, and the internal and external features that remain substantially intact from the 19th century remodelling. As a Grade II Listed Building, Firtree Farmhouse is a **designated heritage of less than the highest significance**.

Contribution of setting

- 9.4.13 The Listed Building also derives a level of significance from its setting, with the architectural, aesthetic and historic interest of the asset being best experienced from within the private garden. The garden retains its sense of separation from the surrounding countryside and worked agricultural landscape. Legibility of the historic garden curtilage is implied by the ground level differences surrounding the building, with much of the higher ground to the east and north having historically been planted as orchard. Despite this now being more open, there is never-the-less a strong legibility of the garden curtilage as seen on historic maps, enclosed by boundary hedgerows and trees creating a sense of enclosure and privacy which distinctly separates it from the broader agricultural landscape. The surviving large and spacious garden setting reinforces its status as a gentrified farmhouse, informed by its relationship with the former farmstead to the south and surrounding rural landscape which allows for the interpretation of farmstead use.

- 9.4.14 At present, the relative isolation of the enclave within the rural landscape, means the farmhouse retains its historic aspect over the reconstructed farm buildings (and fields beyond). However, these views are relatively limited due to existing deciduous vegetation in leafy months and topography, particularly to the east where the ground slopes up and affords no designed or important view of the surrounding landscape. There are a limited number of fortuitous views to the north from the single first floor window in the bedroom through the boundary vegetation looking over the fields to the northern adjoining the historic grounds of Fair Oak Lodge. Although not principally a 'designed' view, the window was inserted at a later date, presumably to give an aspect over the garden. The windows in the principal east elevation afford similar views, but these were not likely 'designed' to give the view so much as to articulate the polite symmetrical composition of the elevation. Victoria House tends to block any views to the south.

9.4.15 Within the grounds, the most important experiential aspect of the Listed Building's setting is the sense of enclosure and privacy afforded by the boundary hedgerows and mature trees, as well as the relative tranquillity afforded its situation within the rural area. The insertion of the modern domestic features such as the swimming pool and tennis court and the later move towards equine activity (not associated with the historic narrative) make a more neutral contribution to the setting.

Built heritage assets within the surrounding landscape

9.4.16 A further nine Grade II Listed Buildings located within the 1km study area surrounding the Site. These comprise:

- Grade II Listed Rambler's Cottage, located, c. 130m to the east;
- Grade II Listed Saxon Court, located c. 250m to the east;
- Grade II Listed The Cockpit at The Cockpit Farm, located c. 730m to the east;
- Grade II Listed The Bush, located c. 300m to the north-east;
- Grade II Listed The Old George Public House, located c. 1km to the north;
- Grade II Listed West Horton Farm Cottages, located c. 800m to the west;
- Grade II Listed Moorgreen Farmhouse, located c. 850m to the south at Moorgreen Farm; and
- Grade II Listed Granary to the south-east of Moorgreen Farmhouse, located c. 850m to the south at Moorgreen Farm; and
- Grade II Shamblehurst Farmhouse, located c. 1.4km to the south-east.

9.4.17 In addition, a small number of locally listed buildings are located in Fair Oak to the north of the Site. Further groups of non-designated heritage assets are located at Lake Farm, c. 160m to the west of the Site, and Allington Manor Farm, c. 420m to the west (Appendix 9.1: Figure 4).

9.4.18 Initial assessment of the above assets as part of the DBA, including analysis of cartographic sources, aerial photographic sources and the site visit, revealed that the Site was considered to make no contribution to the significance of these designated and non-designated built heritage assets, and shared no intervisibility with the heritage assets concerned. It was clear that the Proposed Development would not have the potential to change the setting, or affect

the significance of these buildings and, in conforming with Stage 1 of the Historic England guidance on setting, all of these buildings were scoped out from further assessment.

9.5 INHERENT DESIGN MITIGATION

- 9.5.1 For OPA Phase 1, the assessment concluded there are no sensitive built heritage receptors, and no inherent mitigation is required.
- 9.5.2 For the Wider OPA, the proposals are outline in nature at this stage, with all matters in respect of design and layout to be brought forward in phases. The Proposed Development surrounding the Listed Building is to be brought forward as part of Phases 3 and 6, subject to detailed reserved matters applications. Any works to the Listed Building itself will require Listed Building Consent. It is anticipated that the primary mitigation measures incorporated into the Proposed Development will be informed by the statutory duty and relevant policies which protect the significance of designated heritage assets in terms of their historic fabric, architectural or historic features and setting.

9.6 POTENTIAL ENVIRONMENTAL IMPACTS & EFFECTS

OPA Phase 1

Construction Impacts and Effects

- 9.6.1 As outlined within the Baseline, no sensitive receptors have been identified in relation to OPA Phase 1, and no impacts will occur at the Construction stage.

Occupation Impacts and Effects

- 9.6.2 No impacts have been identified in relation to built heritage during the Occupation stage of OPA Phase 1.

Wider OPA

- 9.6.3 The Proposed Development will include areas of housing, with associated drives and gardens, as well as areas of employment, education and recreation, and areas where the uses are more mixed. An area of employment uses would be focused around Firtree Farmhouse in the northern part of the Wider OPA Site, with residential housing beyond.
- 9.6.4 At this stage, the Proposed Development surrounding Firtree Farmhouse is presented in outline only, based on the EIA Parameter Plans. As such, the proposals for Firtree Farm and the areas surrounding it have not been developed in detail. These are expected to be detailed as part of the later Phase 3 and Phase 6 reserved matters applications. The indirect, non-

physical impacts arising from development within the setting of the Listed Building are assessed on this basis. Additionally, the detail and consideration of uses which may result in direct, physical impacts on the Listed Building, will be incorporated as part of Phase 3 works and are not fully known at this stage.

- 9.6.5 It is acknowledged that there will be impacts on Firtree Farmhouse as a sensitive receptor within the Site, resulting both from physical and non-physical impacts, however it has not been possible at this stage to determine the levels of these impacts. The consideration of effects on the Listed Building is based on the information available as part of the outline application proposals.

Construction Impacts and Effects

Physical Impacts in relation to Firtree Farmhouse

- 9.6.6 The proposed change of use of the Listed Building is expected to require internal and external alterations, which would occur during the Construction Phase and which would result in direct, physical impacts upon Firtree Farmhouse. The suggested use of Firtree Farmhouse and land to the west within the Proposed Development is related to employment uses. Whilst a public use could produce heritage benefits in terms of better revealing the building's special interest to the wider public, where other uses are to be considered, the full implications of those uses (in terms of building regulations, thermal upgrades, accessibility, fire safety, etc) will need to be carefully balanced against maintaining the significance of the building. The DBA (Volume 2, Appendix 9.1) has identified the potential for physical impact on the Listed Building dependent on the proposed use of the building and the degree to which this can be facilitated without substantial alterations to its physical fabric, features and plan form, as well as any implications of the use itself. As defined by the Planning Practice Guidance, the optimum viable use is '*the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes*' (Paragraph: 015 Reference ID: 18a-015-20190723).
- 9.6.7 These physical impacts and resultant change of use could affect the heritage significance of this asset and result in a **Negative effect**. At present, however, as details of the works have not yet been developed, it is not possible to ascertain the severity of the effect. As the Proposed Development could potentially result in an adverse significant effect, appropriate measures will need to be implemented at the reserved matters stage.

Non-physical Impacts in relation to Firtree Farmhouse

- 9.6.8 As part of the Construction Phase, works in the vicinity of Firtree Farmhouse could result in impacts in relation to the setting of the Listed Building.
- 9.6.9 The Proposed Development as part of Phase 3 would result in the demolition of Victoria House which sits to the south of Firtree Farmhouse across Firtree Lane. The DBA (Volume 2, Appendix 9.1) has established that these buildings were rebuilt in the late-20th century. As a result, Victoria House has not been found to possess any heritage significance, nor have they been found to positively contribute to the significance of Firtree Farmhouse. The DBA concludes that their demolition would not adversely affect the setting of the Listed Building, and may offer a slight enhancement to its setting in terms of removing features which lack authenticity in design terms and compete with the Listed Building. This has been identified as being of negligible significance and would result in a **Neutral (not significant) effect**.
- 9.6.10 During construction, setting impacts are likely to occur due to the presence temporary security fencing or hoardings, machinery and compounds. Vegetation removal has the potential to create new sightlines within the landscape and temporarily introduce new views of or from the Listed Building. Other experiential impacts will likely include construction noise and traffic within the Site. Construction operations of this nature would be temporary and the resulting impacts would be relatively limited, short-term and reversible in nature when compared with the completed development. Whilst not permanent, this would produce a **Minor Negative (not significant) effect**.

Occupation Impacts and Effects

Physical Impacts in relation to Firtree Farmhouse

- 9.6.11 The physical impacts affecting the historic fabric of Firtree Farmhouse would be confined to the construction phase. As such, there would be no adverse effects in relation to the Listed Building fabric during the operation phase of the Proposed Development.

Non-physical Impacts in relation to Firtree Farmhouse

- 9.6.12 The key change to the setting of Firtree Farmhouse resulting from the Proposed Development would become fully visible during the operation phase.
- 9.6.13 The new buildings and associated roads, services and landscaping within the Site have the potential to introduce permanent change into the setting of Firtree Farmhouse. The DBA has set out the significance of the Listed Building and identifies key aspects of its setting, which is considered to be most sensitive within the defined garden enclave, enclosed by the wooded boundaries. It also derives a level of significance from its relationship with wider rural

landscape, especially to the east, and the experience of it along the modest country lane that is Firtree Lane.

- 9.6.14 Following completion, the Proposed Development has the potential to negatively impact on the significance of the asset through development within these particularly sensitive parts of its setting, from which it derives significance. In particular, the proximity of potential development to the west/north-west of the Listed Building as shown on the EIA Parameter Plans has the potential to affect its significance, where the scale, design and placement of built-form will need to be carefully considered to reduce or mitigate effects.
- 9.6.15 The Proposed Development to the east of Firtree Farmhouse also has the potential to introduce change and potentially harmful effects to the setting of the Listed Building. The Building Heights Parameter Plan suggests that this could be up to 3 storeys in height for those areas within closest proximity to the north, east and west of the building, and up to four storeys for those areas to the south, albeit beyond the retained boundary planting which forms part of the Green Infrastructure of the Proposed Development. The DBA has shown a limited number of views out in the easterly direction from the upper floors of the Listed Building in which this Proposed Development will be read, producing a change from the current agricultural fieldscapes.
- 9.6.16 There is potential for these changes within the wider landscape setting of Firtree Farmhouse to affect its significance as a designated heritage asset. The degree to which this will impact on its significance will depend on the detailed design of the Phase 6 works and will need to be assessed in the future in terms of building heights, scale and massing, layout including pattern and urban grain, as well as soft landscaping and vegetation. As this is one of the later phases of work, density will also be a key consideration, as viability can change over time. Higher densities of built form to the immediate east of the Listed Building could result in greater impacts, though there appears to be scope for this to potentially be absorbed in other places as necessary.
- 9.6.17 Areas of housing are also proposed to the north, west and south of the grade II Listed Building. Current proposals indicate that there may be some intervisibility between Firtree Farmhouse and these areas of proposed housing, particularly to the south. Thus, the Proposed Development may alter part of the wider setting of the Grade II Listed Building. At present, these areas make a very minor contribution to its significance.
- 9.6.18 These non-physical impacts are expected to affect the heritage significance of this Listed Building and result in a **Negative effect**. As only outline proposals are known, it is not possible to ascertain the severity of the effect. Therefore, as the Proposed Development could

potentially result in an adverse significant effect, appropriate measures will need to be implemented at the relevant reserved matters stage(s).

9.7 ADDITIONAL MITIGATION, COMPENSATION & ENHANCEMENT MEASURES

9.7.1 The planning policies and guidance, as set out above, require a mitigation response to potential impacts upon the historic environment in order to avoid, minimise or offset such impacts as appropriate. The NPPF makes the following provisions in respect of impacts to the significance of designated heritage assets: 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification' (Paragraph 194).

9.7.2 Where significant effects are anticipated, mitigation may be necessary to adequately address these effects, in order to reduce or offset the harm (effect on) to the importance (significance) of designated heritage assets.

OPA Phase 1

9.7.3 No mitigation or enhancement measures are necessary in relation to OPA Phase 1.

Wider OPA

Construction

Mitigation to Address Physical Impacts in relation to Firtree Farmhouse

9.7.4 As the proposed change of use is likely to result in physical impacts upon the Listed Building itself, which could result in an adverse effect upon its significance, the potential effects will need to be appropriately considered within future applications (i.e. as part of the reserved matters application for Phase 3, as well as Listed Building Consent, which will be required for any proposals affecting the physical fabric of the structure). It is proposed that a staged process is implemented in formulating detailed proposals affecting the building, which would ensure that any new use represents the optimum viable use and that the physical alterations respond sympathetically to the building's heritage sensitivities, particularly in terms of historic fabric, surviving historic features, character and plan form.

9.7.5 When a new use has been identified and proposals have been formulated, a more targeted Heritage Impact Assessment would ensure that the proposals respond to the building's heritage sensitivities and mitigate against any harm to its significance, and support any applications for Listed Building Consent or Planning Permission.

- 9.7.6 It is recommended that any detailed designs are developed in consultation with heritage specialists and stakeholders, to ensure that any harm is avoided/minimised, works within the Listed Building are sensitive, and opportunities for enhancement are created. For instance, historic features within the building such as stairs should be protected from damage and ideally, not used, by construction personnel during the implementation of any physical works to the Listed Building which might lead to inadvertent damage or excessive wear and tear. This would have the potential to lead to significant effects on the Listed Building, but potential harm could be mitigated through development of a construction methodology for works to the Listed Building. The proposal plans would inform a targeted Heritage Impact Assessment, focusing on the potential for the development to affect the significance of the farmhouse, to be submitted as part of reserved matters and Listed Building Consent applications.
- 9.7.7 Following the finalisation of the optimum proposals to the Listed Building, if further measures are required to mitigate the identified effects, these measures could be secured via appropriately worded planning conditions, attached to the reserved matters consent and any necessary Listed Building Consents. The scope and scale of such works is unknown at the moment, and would be agreed through consultation with heritage advisors to the LPA, but for instance this could include a historic building watching brief during works which could affect, or reveal, historic fabric.

Mitigation to Address Non-physical Impacts in relation to Firtree Farmhouse

- 9.7.8 No specific measures have been identified to reduce the potential for impact in the Construction Phase beyond the normal restrictions on hours of operations. Some of the vegetation on the boundary may need to be temporarily removed to facilitate construction within the grounds and/or works to the Listed Building itself. Where necessary, this should be limited in scale and carefully sited (i.e. corresponding with areas of permanent removal as needed) to limit the potential for longer-term impacts. The details of any such works should be provided within the reserved matters application, and thoroughly considered within an appropriate targeted Heritage Impact Assessment, as necessary.
- 9.7.9 The degree to which development within the setting of the Listed Building will impact on its significance will depend on the detailed design of the anticipated Phase 3 and Phase 6 works where the scale, design and placement of built-form will need to be carefully considered to reduce or mitigate effects. It is recommended that any detailed designs are developed in consultation with heritage specialists and stakeholders, to ensure that proposals sensitively respond to the setting of the Listed Building in terms of density, building heights, scale and massing, layout including pattern and urban grain, as well as soft landscaping and vegetation. Through the adoption of appropriate design standards and layout of the structures within the

Proposed Development, any harm to its significance will be minimised. Further mitigation may be achieved by the maintenance and enhancement of vegetative screening around the margins of the Wider OPA Site.

Occupation

Mitigation to Address Physical Impacts in relation to Firtree Farmhouse

9.7.10 Beyond normal wear and tear, there will not be any physical impacts to the Listed Building to in relation to the occupation phase of the Proposed Development, and as such no mitigation is required.

Mitigation to Address Non-physical Impacts in relation to Firtree Farmhouse

9.7.11 The details of the Proposed Development in relation to the surroundings of the Listed Building are not yet finalised. However, there will be opportunities at the reserved matters stage.

9.7.12 Retention of the key aspects of the immediate garden setting of Firtree Farmhouse would protect the Listed Building from the encroaching effects of the Proposed Development and allow it to retain the feeling of spaciousness. Limited inter-visibility through current and enhanced tree screening would help retain the experience of privacy and seclusion from within the grounds and could be enhanced by the consideration of a green buffer zone around the garden enclosure to the north and east. Within its historic garden area, enhancement could be taken further to include reinstatement of elements of orchard planting which would reference the former use of part of the grounds, or other formal garden features which might help to screen any built-form or incongruous features (such as parking).

9.7.13 While the assessed levels of potential visual impact would likely not result in anything but less than substantial harm to the significance of the asset, some degree of mitigation could be achieved by the maintenance and enhancement of vegetative screening around the margins its historic curtilage, and by the adoption of appropriate design standards and layout of the structures within the broader Wider OPA Site.

9.8 RESIDUAL ENVIRONMENTAL IMPACTS & EFFECTS

OPA Phase 1

9.8.1 There will be no residual impacts on the built heritage resource as a result of OPA Phase 1.

Wider OPA

Construction

9.8.2 The Proposed development is likely to affect the significance of the Listed Building, largely as a result of physical impacts during the construction phase. Although the extent of the impacts is not known at this stage, as detailed plans have not yet been formulated, it is anticipated that the resultant effect would be **non-significant (minor negative)**, subject to these following an appropriate process and ensuring proposals are developed sensitively in response to the identified heritage significance of the asset, together with the implementation of appropriate mitigation measures.

Occupation

9.8.3 Once completed, the non-physical effects of occupation of the Proposed Development are also likely to affect the significance of the Listed Building. As detailed plans have not yet been formulated, and the extent of these impacts is therefore not known, it is considered that if an appropriate process is followed, and the proposals respond sensitively to the identified heritage significance of the asset and with implementation of appropriate mitigation measures, it is anticipated that the resultant effect would be **non-significant (minor negative)**.

9.9 CUMULATIVE EFFECTS

9.9.1 A schedule of committed schemes presented in Chapter 5 have been considered with regard to the cumulative effects of the Proposed Development on the built heritage resource. The Listed Firtree Farmhouse is situated at a distance from the committed developments, and the key impacts relate to the Proposed Development (physical change to the building's fabric, as well as development within its immediate setting). Following completion of the Proposed Development, the Listed Building would not be affected in any way by the committed schemes and there would be no change to the effects as discussed in section 9.8 of this ES chapter.

9.10 IMPACT OF CLIMATE CHANGE

9.10.1 Historic England advocates sympathetic, informed maintenance, upgrade and reuse of existing buildings as an inherently sustainable approach. They have done extensive studies into 'Carbon in the Built Historic Environment'¹¹ and have adopted a position statement on climate change and sustainability¹² based on their understanding of sustainability over the long term. Part of this involves promoting the 'whole building approach' and consideration of the 'whole-life carbon of materials'.

¹¹ <https://historicengland.org.uk/research/heritage-counts/2019-carbon-in-built-environment/>

¹² <https://historicengland.org.uk/whats-new/statements/statement-on-climate-change-and-sustainability/>

9.10.2 Based on the UKCP18 projections identified in relation to the Site, there are no anticipated impacts on built heritage assets due to climate change in the short-term beyond general maintenance of the building in order to minimise risks to the fabric (from increased rainfall, driving winds, etc.). In the medium- to long-term, measures to improve the building's thermal performance may be desirable, but should be contextualised within an understanding of how the building actually performs and embodied carbon in the historic fabric. English Heritage's guidance on Climate Change and the Historic Environment (2008) recognises that decisions to adapt or introduce upgrades need to be well-informed as poorly specified measures can *'not only diminish the significance of historic assets but also reduce their flexibility to respond to future climate change'*.

9.11 ASSESSMENT SUMMARY

9.11.1 Under Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the statutory duty requires 'special regard' to be paid to 'the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The significance of the Listed Building is also protected under Section 16 of the NPPF, requiring 'great weight' to be given to its conservation (Paragraph 193) with any harm to significance to be convincingly justified (Paragraph 194) and balanced against any public benefits (Paragraph 195-196). It is clear within the NPPF (Paragraph 194) that significance of a heritage asset can be harmed through development within its setting.

9.11.2 This chapter has shown that there is potential for adverse effects on designated heritage assets within the Site boundary. This includes Firtree Farmhouse, Grade II Listed Building that may be subject to significant effects in the completed, occupational phase. With appropriate design mitigation, any effects can likely be reduced, so as not to result in significant effects.

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Table 9.3: OPA Phase 1 - Built Heritage Assessment Summary

Environmental Effect	Sensitivity of Receptor	Nature of Impact	Impact Magnitude	Significance	Additional Mitigation	Residual Impact Magnitude	Residual Significance of Effect
Construction Effects							
None identified	N/A	Not required	N./A	None identified	N/A	Not required	N./A
Operation Effects							
None identified	N/A	Not required	N./A	None identified	N/A	Not required	N./A
Cumulative Effects							
Effect	Description				Mitigation		Significance
None identified	N/A				Not required		N./A
Impact of Climate Change							
Effect	Description				Mitigation		Significance
None identified	None identified	N/A		None identified	N/A	Not required	None identified

Table 9.4: Wider OPA - Built Heritage Assessment Summary

Environmental Effect	Sensitivity of Receptor	Nature of Impact	Impact Magnitude	Significance	Additional Mitigation	Residual Impact Magnitude	Residual Significance of Effect
Construction Effects							
Physical impact to Firtree Farmhouse as a result of change in use (arising from changes to building fabric and possible wear	Grade II Listed Building – designated heritage asset of less than the highest significance	Direct, permanent	Negative (level cannot be ascertained on the basis of current information)	Negative (level cannot be ascertained on the basis of current	Heritage Impact Assessment following identification of new change of use. Potential further measures could	Minor Negative	Minor Negative

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and tear associated with new use)				information)	include historic building watching brief.		
Non-physical impact to Firtree Farmhouse as a result of construction traffic, machinery, noise and vibrations, hoarding, and alteration of views due to removal of vegetation	Grade II Listed Building – designated heritage asset of less than the highest significance	Indirect, temporary	Minor Negative	Minor Negative	Any required hedgerow removal should be carefully sited and limited in scale. Appropriate siting of construction activities.	Minor Negative	Minor Negative
Non-physical impact to Firtree Farmhouse due to removal of Victoria House	Grade II Listed Building – designated heritage asset of less than the highest significance	Indirect, permanent	Neutral	Neutral	None required	Neutral	Neutral
Operation Effects							
Non-physical impact to Firtree Farmhouse due to changes in its setting resulting from presence of new development	Grade II Listed Building – designated heritage asset of less than the highest significance	Indirect, permanent	Negative (level cannot be ascertained on the basis of current information)	Negative (level cannot be ascertained on the basis of current information)	Retention of the key aspects of the immediate garden setting of Firtree Farmhouse and potential reinstatement of orchard planting. Retention and enhancement of existing vegetation screening. Adoption of appropriate design standards and layout of new buildings.	Minor Negative	Minor Negative
Cumulative Effects							
Effect	Description				Mitigation		Significance
None identified	N/A				Not required		N./A
Impact of Climate Change							
Effect	Description				Mitigation		Significance

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Potential impact to historic fabric of Firtree Farmhouse	Potential damage to and/or deterioration of building fabric as a result of increased rainfall and driving winds.	Adopt and implement an appropriate maintenance strategy. Improvements to building's thermal performance, should be undertaken with due consideration of the appropriate guidance and an understanding of the performance of the building fabric.	Minor Negative
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Table 9.5: OPA Phase 1 - Mitigation Implementation

Mitigation Measure	Implementing Agent(s)	Legal Instrument	Compliance Target	Implementation Timescale
None required	N/A	N/A	N/A	N/A

Table 9.6: Wider OPA - Mitigation Implementation

Mitigation Measure	Implementing Agent(s)	Legal Instrument	Compliance Target	Implementation Timescale
Heritage assessment following identification of change of use to Firtree Farmhouse	Developer	Listed Building Consent; Planning Condition	Assessment to be submitted as part of future planning application and Listed Building Consent.	At reserved matters application for Phase 3 (or any stand-alone application for works to the Listed Building).
Mitigation by design to ensure appropriate layout and design which responds sensitively to the Listed Building and its setting	Developer/LPA	Planning Condition	Through planning application as part of reserved matters stages for Phases 3 and 6.	At reserved matters application stage for Phases 3 and 6.