

Heritage Impact Assessment

HELAA - Preferred Options 2013-2033 Site allocations Mansfield District Local Plan 2018



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PART A

Introduction

In December 2017 Mel Morris Conservation was commissioned by Mansfield District Council to undertake a Heritage Impact Assessment of preferred Local Plan allocations within Mansfield District for the emerging Plan. The scope of the assessment did not incorporate all of the reasonable alternatives identified within the Housing Economic Land Availability Assessment (HELAA), which it was considered could be assessed at a future time, on an ad-hoc basis, if required.

The sites assessed include three large strategic sites, each of which has been examined and visited as part of this HIA. These are set out in the Preferred Options document, as follows:

- Pleasley Hill Farm 925 homes 12.22 Ha of employment land, retail and community facilities (page 19)
- Land off Jubilee Way 800 homes, 6.7Ha employment, remodelling of rugby club and golf course (page 20)
- Land at Old Mill Lane up to 515 homes (page 21)

The sites which were chosen to be assessed were selected by Mansfield District Council following circulation of the full list of preferred sites in the autumn of 2017 to both Historic England and the District Council's conservation officer. Representations were made in the autumn of 2017 by the Historic England planning adviser and the conservation officer has advised on the site selection process.

The sites chosen to be assessed for any heritage impacts were further narrowed down after this process of screening. Initial consultation with Mel Morris Conservation recommended that several sites, including nos. 141 and 142, be removed from the assessment because of their lack of visual, physical or associational relationship with designated or non-designated heritage assets, i.e. the sites did not fall within the setting of any designated or nondesignated heritage assets. The suitability of all other sites and impacts on any heritage assets were assessed on the basis of site inspections and background research.

Detailed summaries of each site allocation are included in Part B of this report, on the basis of bespoke pro-forma sheets which were agreed with Mansfield District Council. The pro-forma is designed to adopt the setting assessment triggers contained within the latest setting guidance and follow the step-by-step process - The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) December 2017. All sites are numbered and assessed in accordance with the site numbering adopted for the HELAA.

Setting is confirmed in this guidance, using the same terminology as the NPPF, as,

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary)."

There are 23 sites assessed in this HIA exercise. Several of the strategic sites are conjoined, as follows: 30, 31, 53 and 55 and 52, 74c and 170.

Planning Policy Guidance and Site Selection Screening

There are two Historic England planning guidance papers on site allocations for Local Plans:

<u>The Historic Environment in Local Plans (Good Practice Advice in Planning – 1, March 2015).</u>

Two areas are particularly relevant to the site allocations in Mansfield District and they are:

Cumulative Impact

The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale development. "

Where there are a number of large strategic sites with multiple allocations, this has been taken into account in determining impacts. The cumulative impact of conjoined or closely related site allocations has been assessed as part of this exercise.

and

Planning Across Boundaries

Conservation of the historic environment may involve cross-boundary issues, where development proposals near the boundary of one local authority area potentially affect the setting of heritage assets in another. In such cases in exercising the Duty to Cooperate both authorities need to take into account the impact on the conservation and enhancement of the historic environment as one of the strategic priorities (NPPF, Paragraphs 156 and 178).

There are also a number of places where heritage assets, areas of archaeological potential and designed landscapes cross the County or District boundaries, including Pleasley and Hardwick (with Derbyshire), and Rainworth and Lindhurst, with Newark and Sherwood District. Reference has been made to heritage assets and planning applications across boundaries in this report.

<u>The Historic Environment and Site Allocations in Local Plans – Historic England Advice Note</u> <u>3 (October 2015)</u>

The process contains a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.

In particular;

"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)";

In this report significance of non-designated heritage assets has been specifically described in a narrative form.

The guidance confirms that 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.

The first stage of identifying site allocations is 'evidence gathering' using a robust evidence base. In accordance with the guidance and the NPPF, the evidence gathered should relate to both designated and non-designated heritage assets.

The assessment of the impact of a proposed development on the setting of a heritage asset needs to take into account and be proportionate to the significance of the asset being considered, and the degree to which the proposed development enhances or detracts from the significance of the asset and the ability to appreciate the significance.

The definition of significance is set out in Historic England's Good Practice Advice Note and the National Planning Policy Framework (NPPF) 2012. The NPPF states that "the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting".

The step-by-step process of assessment recommended in the Historic England guidance has been adapted into the Pro-forma sheets. Step 5 involves determining whether the proposed site allocation is appropriate in light of the NPPFs tests of soundness. This process and the decision making will be undertaken by the Local Plans team at Mansfield District Council.

The guidance lists the following criteria for assessment:

- 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.

Methodology

Background Research

Map regression was undertaken for all of the sites, using a combination of Ordnance Survey mapping between 1879 and 1972, Tithe and County maps, including Sanderson's map of 1835. Additional research was undertaken in Nottingham archives to investigate certain tithe maps and awards and the Building Plans register for 1890-1930, which includes a non-indexed archive of drawings for Forest Town. All sites were visited at least once.

Photographs and plans were incorporated into the draft report as part of the evidence base and were for the sole purpose of illustrating the findings, which are summarised on the proforma sheets. For copyright reasons some archival sources have not been reproduced in Part B.

Historic Environment Record

All preferred housing allocation sites were referred to the Historic Environment Record and a search was made for data. The search area for the majority was a 50-metre radius from the edge of each boundary, not from the centre-point, with site 127 having a 100-metre radius and site 73 having a much wider search area, to encompass the scheduled monument Fountain Dale Moat. A certain amount of discretion on the part of the HER officer was also agreed and HER data which was thought to be relevant was included in each search area. The results included designated, non-designated layers and Event Layers. All events or monument entries were assessed for their relevance to each site allocation. Sites where the building had been demolished were not included in the impact assessment.

Designated assets and non-designated assets were considered during a site visit to each allocation. This assessment has been one of professional judgement to identify where and whether the setting of a heritage asset would be affected.

Areas close to the District boundaries, such as Newark and Sherwood, were also considered if they had an impact on neighbouring conservation areas and heritage assets.

Designated heritage assets

Designated heritage assets assessed during the process included: Scheduled Monuments, listed buildings, conservation areas. No registered parks and gardens were affected.

Local Heritage Assets

Mansfield District Council maintains a list of Local Heritage Assets. The table of nondesignated heritage assets on page 5 identifies if a heritage asset identified during this exercise is also on the local list (i.e. a Local Heritage Asset). Many non-designated heritage assets that have been identified during this assessment are not Local Heritage Assets, which may reflect the value people place on different aspects of the historic environment.

Non-designated heritage assets

The NPPF makes it clear that non-designated heritage assets can and should be identified as part of plan making process.

141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible."

Non-designated heritage assets include: local list assets, parks and gardens and historic landscapes, archaeological features which are not scheduled, and historic settlements. In reviewing the site allocations for this exercise a number of non-designated heritage assets have been identified, which were not identified separately in the HER search. These have been listed in the table on page 5. These include designed landscapes or designed model villages and designed or evolved farm complexes.

These will need to be assessed under Paragraph 135 of the NPPF (2012):

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

Table of non-designated heritage assets

Location	Description	Local Heritage Asset	
Forest Town	Model colliery village designed and laid out by Bolsover Colliery Company between 1905 and 1911	No	
Forest Town	Cricket pavilion, dated 1909 designed by Percy B. Houfton, recorded in a drawing in the Nottingham archives. Refurbished and re-roofed in concrete tiles ca. 1979. Original form of building survives within later minor modifications	No	
Forest Town	Parsonage to the Church of St. Alban, ca. 1911, designed by Louis Ambler, recorded in a drawing in the Nottingham archive	No	
Forest Town	Church of St. Alban, Old Mill Lane / Clipstone Road, Forest Town, 1911	Yes	
Forest Town	Model colliery housing – Main Avenue and First to Ninth Avenue	No	
Debdale Lane, Mansfield Woodhouse	Debdale Hall gardens and designed landscape grounds	No	
Mansfield	Wheatsheaf PH, 47 Stockwell Gate	No	
Blidworth Lane, Rainworth	Three Thorn Hollow Farmhouse, Blidworth Lane, Rainworth		
Blidworth Lane, Rainworth	Farm complex with planned farmstead at Three Thorn Hollow Farm	No	
Mansfield	Queen Elizabeth Grammar School, Chesterfield Road South, Mansfield	Yes	
Mansfield	Pavilion at Queen Elizabeth Grammar School, Chesterfield Road South, Mansfield		
Warsop Vale	Warsop Vale Model Colliery Village	Yes	

Conclusions

Following the site visits it was concluded that a number of the sites had no impact on designated heritage assets, non-designated heritage assets or archaeological potential. The following HELAA sites were determined to have no impacts on heritage assets: 28, 33, 43, 63, 76, 105, 150, 145 and 146. Nevertheless, for continuity these have still been recorded in the pro-forma sheets, with a clear explanation of why there is no impact. Several of these sites are still recommended to have an archaeological evaluation or watching brief (see pro-forma sheets for details).

Site 175 is located at Warsop Vale. The HER includes an entry for Warsop Vale model housing and Warsop Vale Colliery Village is identified as a Local Heritage Asset. However, the Model Village has been significantly altered and redeveloped and it is no longer readily identifiable as a model village, its original plan form having been largely removed. This does not preclude it from having some historic interest as the former site of a model colliery village and the terraced houses have some continuity of architectural character. Following the detailed site inspection, however, it is concluded that the redevelopment of the former school site will have no impact on the remaining special interest of the colliery housing. The reasoning for this is clearly explained in detail on the pro-forma sheet.

The following sites were also deemed to have an impact, and potential harm, that could be largely mitigated by layout, design and some flexibility of plan layout and relocation of development within the red line, which could be controlled through the planning process:

- strategic site New Mill Lane 30, 31, 53, 55 non-designated heritage assets
- Site 29 non-designated heritage asset
- Site 64 listed building and non-designated heritage assets
- Site 127 listed building and non-designated heritage asset

The full scope of the potential mitigation has not been considered as no detailed plans were submitted showing potential layouts or masterplans.

The following sites have a harmful impact on non-designated heritage assets, which cannot be overcome by mitigation: Site 19 (substantial harm) and Site 73 – Three Thorn Hollow Farm (high harm). The impact of development on each of these sites would need to be judged on the basis of paragraph 135 of the National Planning Policy Framework, balancing the harm against public benefits. There is also identifiable harm to archaeological interest at strategic site Pleasley Hill Farm Site – 52, 74c, 170 (see detailed comments below). At this stage, without a detailed evaluation, it is not known whether the strategic site at Pleasley Hill farm should be judged on the basis of paragraph 139 of the NPPF (of archaeological interest that are demonstrably of equivalent significance to scheduled monuments).

In each case the HE Site Selection guidance suggests a "positive strategy" to "ensure that site allocations avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting". The strategy should also be proportionate to the level of significance.

Details of recommended measures of mitigation and other considerations are included on the pro-forma sheets. The Historic England guidance suggests the following:

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

In the absence of layouts or masterplans opportunities for mitigation or avoiding harm have not been considered in detail, but they should be considered going forward.

Archaeological Potential

In general the northern area of Mansfield extending towards Pleasley and north of Mansfield Woodhouse has been a focus of a high level of flint scatter and artefacts of Mesolithic to Roman date. In these areas it is considered appropriate that a watching brief will be required as a minimum for development sites, unless the land has been previously developed. In a few cases where the site allocation is large a detailed site evaluation will be required prior to determination of a planning application, whether in outline or in full.

There were two areas of strategic allocations where there were a large concentration of finds and archaeological recording; none are designated heritage assets. These relate to Pleasley Hill Farm (sites 52, 74c and 170) and Maun Valley (sites 30, 31, 53 and 55). These sites have no history of development. Whilst the Maun valley site holds little recorded evidence of archaeology on the allocation site, the Pleasley Hill Farm site has been investigated in part and contains areas of regional archaeological interest and other areas, which have not been investigated, with high archaeological potential; for that reason, it will be important that a full evaluation is carried out prior to determining a planning application in order to identify constraints and costs (see separate paragraphs below).

During the process of assessment it became clear that there is no current archaeological monitoring (i.e. development control) role with the County Archaeologist. In the absence of this, and having carried out an HER search of all sites, which identify evidence of archaeology (including spot finds), it is considered appropriate that in some instances detailed archaeological evaluations will be required as part of a planning application and this should be undertaken in advance of preparing any detailed designs, as the findings may influence layout and infrastructure. These should be prepared by a member of the CifA.

Sites where an evaluation will be required pre-determination, going forward are: Sites 28, 29 and 64. Other sites where an archaeological watching brief is recommended (i.e. an archaeological planning condition) are: Site 30/31/53/55, Site 60, Site 73, and Site 105.

Pleasley Hill Farm (Sites 52, 74c, 170)

This site has been recorded during a fieldwalking survey for the proposed line of the Mansfield Western Bypass (report no. TPAU. Oct 1999. Mansfield Ashfield Regeneration Route. Cultural Heritage - SNT2450). Adjoining sites have also been covered similarly during fieldwalking surveys (Sherwood Archaeological Soc, 1976, Fieldwalking Report 1969-1976 (Published document SNT1238), with occasional spot finds –e.g. bronze age

arrowhead (L8574). There are a large number of flint scatter finds discovered during the walkover survey, most on the surface disturbed by ploughing. As might be expected in this area so close to Pleasley Vale and Creswell Crags, the material contains a considerable amount of Palaeolithic to Bronze Age, Neolithic and Mesolithic flint scatter, with some Roman pottery (the Roman Villa site is to the north). There are larger concentrations such as 15 pieces of flintwork at L12178 – and 54 pieces of flintwork at L12179 indicating Mesolithic found in field 10, concentrated near the stream as it bends NW are perhaps centred on the stream running between fields 10 and 8 (M184180). A substantial quantity of heat affected stone was identified in concentrations to both N and S of Penniment Lane. Such material is often found in a settlement context, and is therefore suggestive of prehistoric domestic activity."

No geophysical surveying was undertaken as part of the 1999 report. There is a strong rationale for geophysical or other appropriate survey (to be determined) focused on the findings from the 1999 report. It is recommended that this be carried out prior to allocating the site, because the discovery of occupation may affect the site layout (infrastructure of the site, roads, etc.), location and number of houses and feasibility of preservation in-situ. See detailed comments on the pro-forma sheets.

River Maun - Valley Sites (Sites 30, 31, 53, 55)

The river valley, as distinct from the allocation sites which lie on the rising land to the south of the valley, is publicly accessible and there have been a number of recorded casual finds along the route of the river. These include C16 tokens (L5925), and a Roman brooch (L11049). There are two foci of activity around mill sites which lie to the north of the allocation sites at grid ref. 455500, 363335 and one to the south-west. The south-west upstream site falls on the busy A6117, which has been upgraded, and it is not considered that this concentration of activity will have any bearing on the proposed allocation. The downstream area lies in close proximity to site number 31 and the adjoining site no. 53. The Heritage Assessment produced for the current application (Orion, 2016) concluded that site 31 has low archaeological potential for settlement or other evidence from all periods. The red line area of both sites 31 and 53 includes the steep valley sides to the River Maun. In both of these instances, a high degree of mitigation will be required in providing a buffer to the valley, as suggested by the masterplan for site 31. Whilst there are no designated heritage assets within this valley, a watching brief is recommended, and a WSI going forward.

Archaeological Potential at Site 73 (Three Thorn Hollow Farm)

The archaeological potential of the area has been comprehensively covered in a number of reports for the route of the by-pass (1999) and the development of a wind farm at Lindhurst in Newark and Sherwood District. In view of these findings there is likely to be little evidence of occupation in the fields around Three Thorn Hollow Farm. Given the level of activity in the area, a watching brief is considered appropriate, and a WSI going forward.

Sites 28, 29 and 64

The land at these sites is previously undeveloped and given the location in the northern part of the District where there are a concentration of finds associated with the Paleolithic to Bronze Age, a more detailed archaeological evaluation is considered to be an appropriate prerequisite as part of determining either an outline or full planning application, and a WSI now.

Reporting

Listed buildings have been described and their significance and the contribution that their ⁸

setting makes to their significance has been described. The same approach has been undertaken for all non-designated heritage assets. HER records have been cited where these have a direct relationship with the site or the archaeological context. Not all HER entries have been included in the summaries. The reporting process is naturally selective using professional judgement based on evaluating all of the HER data, site inspection and assessment of significances.

Summary Table

Site no.	Designated HA	Non -designated HA	Relative weighting	Impact*	Mitigation
19	no	Forest Town colliery village Forest town colliery housing	Direct impact Setting	Negative high Negative medium	None achievable
28	no	no			WSI
29	no	Yes Former landscaping associated with Debdale Hall	Indirect impact on setting	Negative Iow	Yes, see details on pro- forma WSI
30	no	River Maun cultural landscape	Indirect Impact - pressure on infrastructure and highways	Negative Iow	Yes, density and infrastructure WSI
31, 53	no	River Maun cultural landscape Site of New Mill	Indirect Impact on setting and pressure on infrastructure and highways	Negative Iow	Yes, landscaping, density and design of infrastructure WSI
55	no	River Maun cultural landscape	Indirect Impact on setting and pressure on infrastructure and highways	Negative low	Yes, landscaping, density and design of infrastructure WSI
33	no	no			
43	no	no			
63	no	no			
52, 74c, 170	no	Site of regional importance, and known archaeology	Direct impact, potentially highly destructive without mitigation	Negative high	Evaluation will determine mitigation
60	Conservation area Listed building	no	Direct impact	Neutral	
64	Yes listed building	Former Grammar School Cricket Pavilion	Indirect impact on setting	Negative medium	Yes, see suggested details on pro-forma WSI
73	no	Thorn Hollow Farm complex	Setting, complete change to LCT and setting	Negative high	No WSI
76	no	Fragment of mineral railway	Direct	Negative low to neutral	Yes, retention of railway embankment and positive enhancement in scheme
105	no	no			
127	yes	yes	Indirect Impact on setting	Not known	Yes, see pro-forma
150	no	no			
45, 46	no	no			
175	no	no			

* Impacts: Negative high / medium / low, Neutral, Positive high / medium / low