Heritage, Townscape and Visual Assessment

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On behalf of Steyn Group

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1.0 INTRODUCTION

1.1 This Heritage, Townscape and Visual Assessment (HTVA) has been prepared by Ignus Froneman of Cogent Heritage, in consultation with the Project Design Team, including This Planning and BAL Architects. The HTVA contains an assessment of the potential townscape and heritage effects of the proposed redevelopment of the land at the Almero Student accommodation, Ladybarn House (**Fig 1**, the 'Site' hereafter).

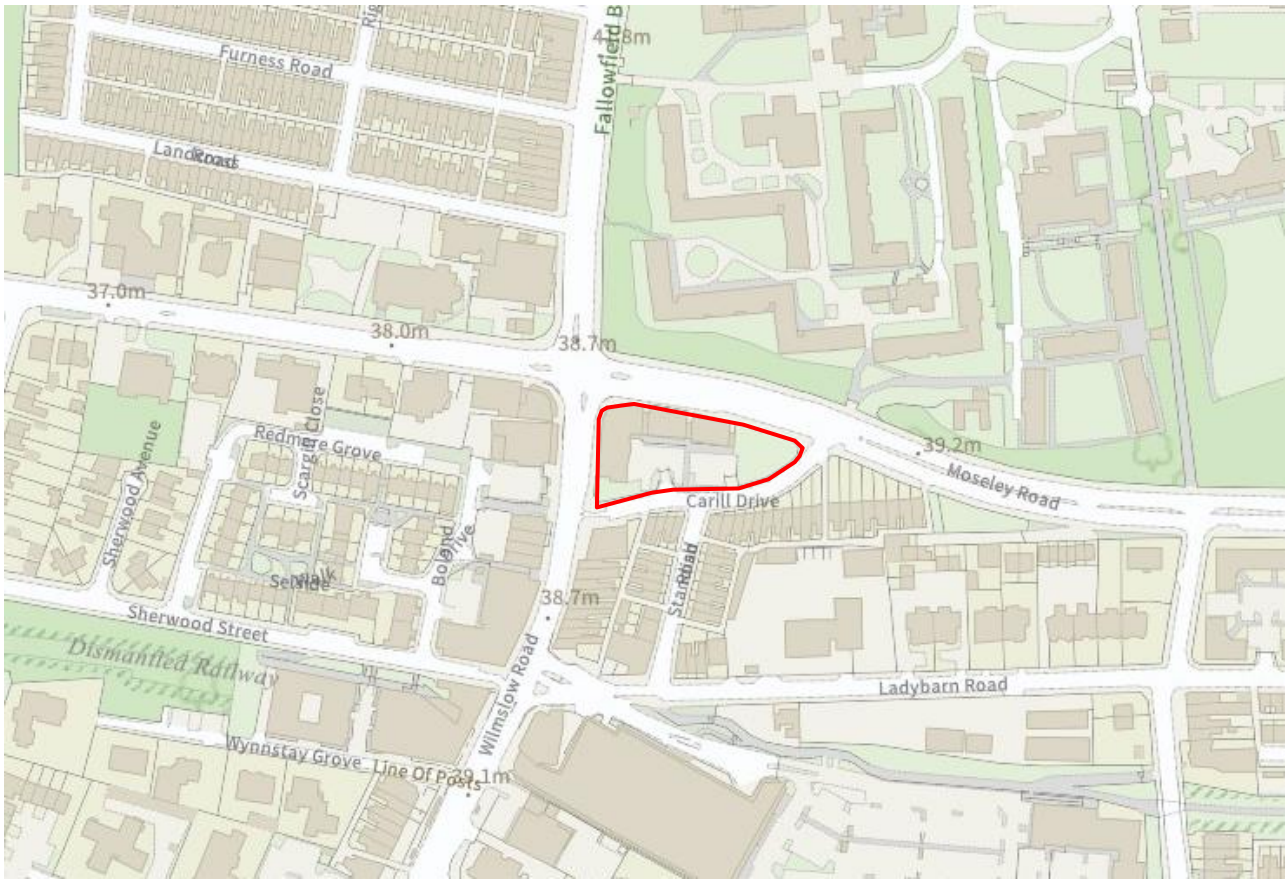


Fig 1: An Ordnance Survey map extract, showing the approximate location of the Site in red outline.

1.2 This assessment has been produced by Cogent Heritage, an independent townscape and heritage consultancy. The author of this report has over 20 years of experience in the historic built environment, and townscape assessments. The images of the Proposed Development have been produced by BAL Architects. The HTVA should be read alongside the full suite of submitted information, including the Design and Access Statement.

1.3 Section 2 of this report contains the assessment of the Proposed Development on townscape and visual amenity. Section 3 contains the impact assessment of the Proposed Development on heritage assets. The heritage impact assessment is at Section 4. A summary of the planning policy context relevant to the assessment included at Appendix 1.

2.0 TOWNSCAPE & VISUAL BASELINE

INTRODUCTION

Structure

2.1 This section starts by briefly considering the definitions used in the assessment.

2.2 The status of the local context of the Site is then considered, with reference to any relevant heritage/townscape designations, which help to calibrate its sensitivity.

2.3 That is followed by an overview of the townscape character of the area around the Site. Given the relatively limited extent to which the Proposed Development would be visible, the townscape is not broken down in conventional character areas, but instead it is described in a narrative way and illustrated in places with photos from the site visit.

2.4 The value and susceptibility of the townscape context of the Site in its present state is then assessed, as the baseline against which the impacts of the Proposed Development must be assessed. The section is concluded by reference to the nature of the townscape in the context of the Site, and its sensitivity, as well as the sensitivity of visual receptors.

Definitions

2.5 In this as assessment, 'townscape' is referred to in the way it is described at paragraph 2.7 in the *Guidelines for Landscape and Visual Impact Assessment* (Third edition, published 2013 by the Landscape Institute and Institute of Environmental Management & Assessment – 'GLVIA3' hereafter), namely:

"*'Townscape' refers to areas where the built environment is dominant. Villages, towns and cities often make important contributions as elements in wider-open landscapes but townscape means the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces. There are important relationships with the historic dimensions of landscape and townscape, since evidence of the way that villages, towns and cities change and develop over time contributes to their current form and character*."

2.6 In accordance with GLVIA3, the first step in the assessment process should be to consider effects in terms of the **sensitivity** of the townscape and/or visual receptors, which is arrived at by making judgements about:

i. the **susceptibility** of the receptor to the type of change arising from the specific proposal; and

ii. the **value** attached to the receptor.

2.7 The guidance inn GLVIA3 generally distinguishes between the '**impact**', defined as the action being taken (the Proposed Development in this instance), and the '**effect**', defined as the change resulting from that action (the way in which the townscape would be affected by the Proposed Development).

2.8 In accordance with paragraph 6.17 of GLVIA3, the effects of development on private properties are typically dealt with through residential amenity assessments. These are separate from the townscape assessment, although the assessment of visual effects may sometimes be carried out as part of a residential amenity assessment.

STATUS OF THE LOCAL AREA/DESIGNATIONS

2.9 As a starting point, it can be noted that there are very little by way of designations indicating the context of the Site to be of high value. The site does not fall within any identified locally protected views or panoramas. The only designation highlighted on the Local Development Framework Area Map Browser on the Council's website, is that the Site falls within the Fallowfield District Centre (see **Fig 2** below).

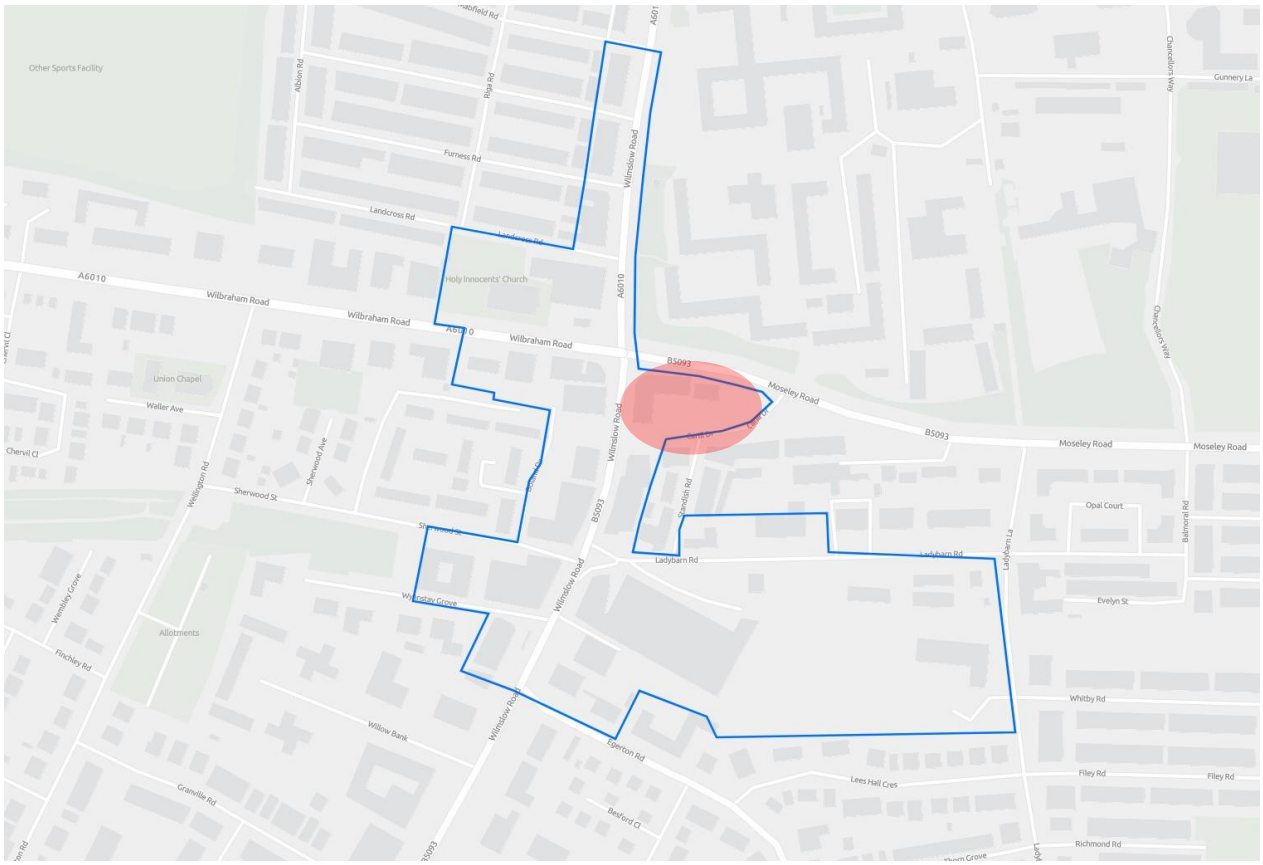


Fig 2: An extract from the Local Development Framework Area Map Browser on the Council's website, showing the Fallowfield District Centre in blue. The approximate location of the Site is shown in red.

2.10 There are no heritage designations covering the Site. The local area is not in, or near, a conservation area. There is a group of three listed buildings to the NW of the application site (see **Fig 3** below) and a listed synagogue further to the west on Wilbraham Road.

2.11 The map extract from Historic England's online National Heritage List map (**Fig 3**) shows the locations of the nearby listed buildings with blue markers; the listed buildings are all grade II listed and they are listed below, from west to east:

i. The Church of the Holy Innocents and St James.

ii. The Fallowfield War Memorial.

iii. The former Sunday School, now in restaurant/bar use and listed as the 'Queen of Hearts Public House'.

2.12 However, the existing intervening student accommodation building on the Site separates the listed buildings from the area where the Proposed Development would be located, and there would be no co-visibility between the listed buildings and the Proposed Development (**Photos 1 & 2**).

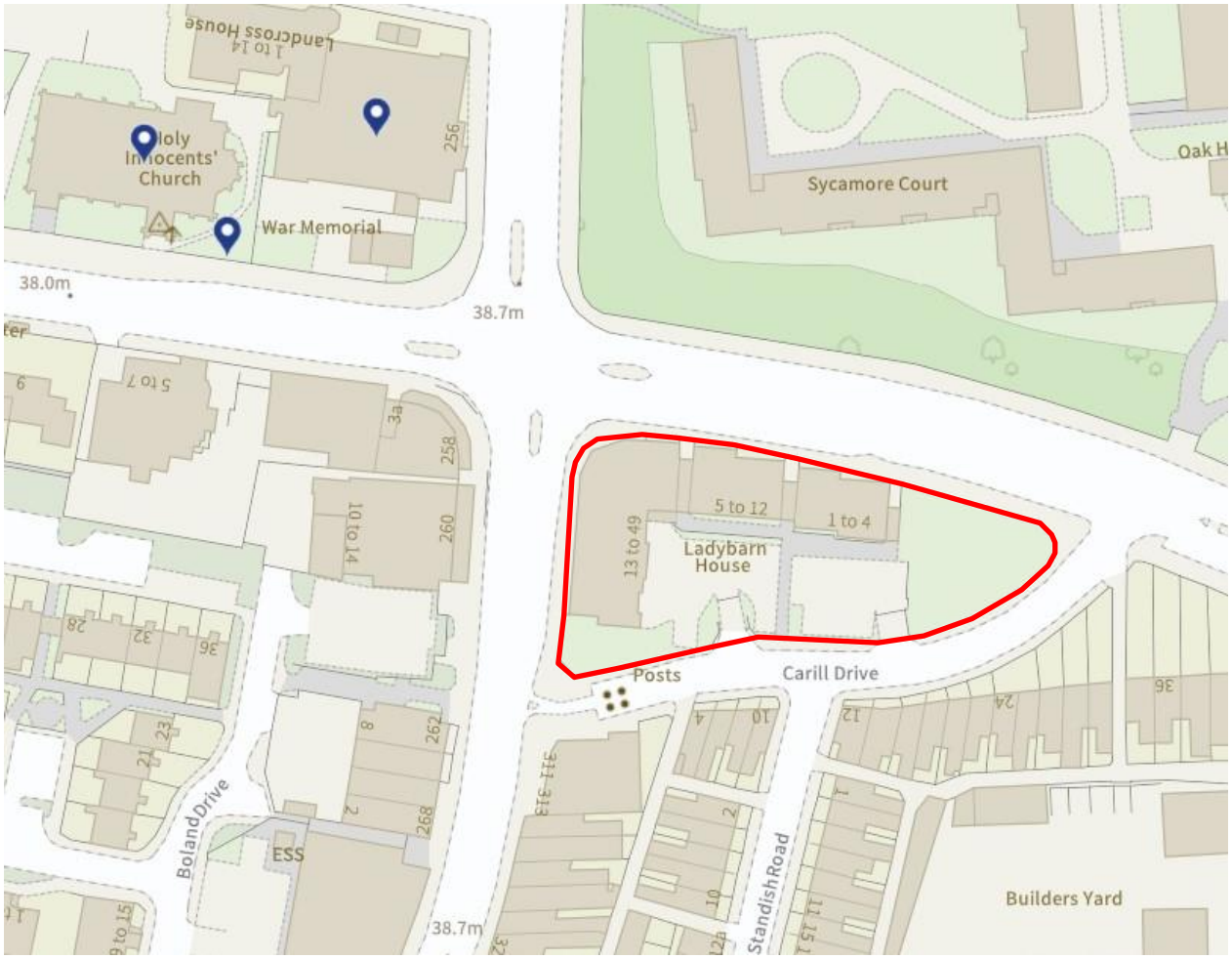


Fig 3: An extract from Historic England's online National Heritage List map, showing the locations of the listed buildings with blue markers, and with the approximate location of the Site outlined in red.



Photo 1: An aerial view looking NW across the Site towards the Church of the Holy Innocents and St James, and the former Sunday School (largely obscured by trees). The existing building on the Site can be seen to intervene between the listed buildings and the location of the Proposed Development.



Photo 2: A view looking towards the Site from the former Sunday School (on the right). The existing building on the Site can be seen to intervene between the listed building and the location of the Proposed Development.

2.13 Aside from the three grade II listed buildings, and the synagogue further west on Wilbraham Road, there are no listed buildings nearby (these designations are protected by the 1990 Planning Listed Buildings and Conservation Areas Act 1990).

TOWNSCAPE

The Site

2.14 The Site is bound by Wilmslow Road to the west, Moseley Road to the north, and Carill Drive to the south. The existing student accommodation block on the Site (**Photo 3**) occupies the west and north sides of the Site, in the form of an L-shaped building of four storeys, under a shallow pitched roof, and with a five storey corner feature. The building is in red and yellow brick, with a series of three storey bow windows and an artificial stone cornice. The northern range is composed of interlocking blocks, separated with glazed 'links'. The southern part of the Site, where the Proposed Development would be located, is a paved area of car parking and hardstanding (**Photo 4**), with boundary vegetation along Carill Drive. The rear elevation of the building is simpler and looks somewhat dated. To the east side of the Site is a landscaped area of deciduous trees and grass, behind a dwarf wall and railings (**Photo 5**). There are tables, indicating this area used as amenity space, for residents of the existing building on the Site.



Photo 3: The existing building on the Site



Photo 4: The rear of the existing building on the Site, and the car parking area behind it.



Photo 5: To the east side of the Site is a landscaped area of deciduous trees and grass, behind a dwarf wall and railings.

The local townscape context

2.15 The local townscape context is mixed. To the north of the Site is Manchester University's Fallowfield Campus (**Photo 6**). The buildings here, opposite the Site, appear to date from the c. 1980s and are arranged as long, L-shaped blocks (sometimes with interlocking L-shaped blocks) of four storeys over shallow pitched roofs.



Photo 6: An aerial view looking north over the Site towards Manchester University's Fallowfield Campus.

2.16 The small group of three listed buildings to the NW makes up a pocket of C19 ecclesiastical townscape to the NW of the Site (**Photo 7**). The Gothic style church, with its prominent eastern spire, is raised in coursed yellow sandstone rubble, with red sandstone dressings and a steeply-pitched slate roof featuring decorative lozenge motifs (**Photo 8**). It dates from 1870-2 and was contemporary with the former Sunday School, a tall single storey building with lancet dormers to the south (**Photo 9**). Both buildings were designed by the same architect and constructed at the same time, which gives a great sense of coherence between the two. The Fallowfield War Memorial is in a Celtic-style, with a stone shaft and wheel-cross, and it stands in the churchyard of the church; it is a much smaller and more recessive structure. To the north of the ecclesiastical group is an area of late-Victorian terraced houses. A new four storey housing development stands to the west of the church.



Photo 7: An aerial view looking NW towards the Church of the Holy Innocents and St James, and the former Sunday School (largely obscured by trees).



Photo 8: The Church of the Holy Innocents and St James.



Photo 9: The south elevation of the former Sunday School.

2.17 The townscape on the south side of Wilbraham Road is more mixed. A curved, three storey interwar commercial building marks the corner, opposite the existing student accommodation on the Site (**Photo 10**). Beyond it, to the east, is a mixed townscape composed of heavily modified/adapted and extended C19 / C20 buildings of one to three storeys. These generally look modern, but they incorporate some retained older structures.



Photo 10: A curved, three storey interwar commercial building marks the corner opposite the existing student accommodation on the Site.

2.18 The west side of Wilmslow Road is taken up by two and three storey modern red brick buildings, and a gap used as a parking area. Towards the south, at the junction with Sherwood Street, is a large modern block, which includes a five storey corner element (**Photo 11**). The east of Wilmslow Road contains a C19 three storey red brick terrace with shops at the ground floor, with gault brick and red polychromatic detailing to the houses towards the north (**Photo 12**). On the corner with Carill Drive is a red brick and sandstone former bank building of 1895, featuring distinctive Dutch gables (**Photo 13**). It is arranged to face both roads (i.e. north and west, but with the primary frontage to the west facing Wilmslow Road) and has a corner entrance.



Photo 11: Towards the south, at the junction with Sherwood Street, is a large modern block.



Photo 12: The east of Wilmslow Road contains a C19 three storey red brick terrace with shops at the ground floor, with gault brick and red polychromatic detailing to the houses towards the north.



Photo 13: On the corner with Carill Drive is a red brick and sandstone former bank building of 1895, featuring distinctive Dutch gables.

2.19 Carill Drive is fronted with red brick Edwardian terraced houses of similar design, and these also extend southwards into Standish Road (**Photo 14**). The houses have bays, with the deep eaves of the shallow pitched roofs carried on brackets spanning between these. Above the bays are gables (these are shared between neighbouring houses, with smaller single gables to the bays of the end of terrace houses). The curving Carill Drive dates from a time before the creation of Moseley Road, and it historically provided access to the villas once located to the north of Moseley Road. Moseley Road was created between the 1907 and 1922 Ordnance Survey maps, and the formation of this road created the distinctive triangular shape of the Site.



Photo 14: An aerial view looking south from above the Site towards the terraced houses on Carill Drive and Standish Road.

THE SENSITIVITY OF THE TOWNSCAPE IN THE CONTEXT OF THE APPLICATION SITE

2.20 Having considered the townscape character around the Site, the sensitivity of the townscape in the context of the Site is briefly considered, which is arrived at by making judgements about:

i. the **susceptibility** of the townscape to the type of change proposed; and

ii. the **value** of the townscape.

2.21 The value of the townscape in its existing state can generally be expressed as high, medium or low (or at an intermediate point between these value levels, e.g. 'low to medium').

2.22 The importance of a townscape is determined by any recognition that it may have, the importance of elements within it, and by its amenity value. Recognition includes heritage designations e.g. a conservation area (albeit that not all parts of a conservation will necessarily be of higher value, and not all views within, or out of, a conservation area will necessarily be sensitive). In this case, the Site does not feature

in identified local views, or any views relevant to a conservation area, or any other heritage asset/designation (aside from the existing corner building being visible from / in conjunction with the listed ecclesiastical buildings to the NW).

2.23 In respect of townscape, the overall character and coherence of the townscape is relevant to an assessment of its value and quality. The assessment of value also takes into account the following heritage assets and their settings, in decreasing order of importance (this is only a general guide, as is explained below):

i. world heritage sites, grade I or grade II* listed buildings and registered parks and gardens, above-ground scheduled ancient monuments;

ii. grade II listed buildings, conservation areas and registered parks and gardens; and

iii. non-designated heritage assets (e.g. locally listed buildings).

2.24 The value of a townscape is likely to be higher if it overlooks/includes important heritage assets.

2.25 There are obviously no such heritage assets, or their settings, relevant to the Site, aside from the listed ecclesiastical buildings to the NW, albeit that the existing building obscures the area where the development is proposed. There is a degree of coherence to the Edwardian terraced houses in the area to the south of the Site, and the Victorian buildings on Wilmslow Road. That said, this is not a townscape of high value and there is already a juxtaposition between the Edwardian terraced houses and the existing building on the Site, to the north, and the Sainsbury's superstore building to the south. There is nothing remarkable about the Edwardian terraced houses, which represent an everyday streetscape.

2.26 With regard to amenity value, locations such as parks and riverside walkways, which are used for leisure purposes, are considered to be more sensitive in visual and townscape terms than everyday streetscapes, or areas with no amenity value. In this case the townscape surrounding the Site constitutes examples of everyday streetscapes, with no specific attributes of amenity value or townscape interest. There is greater coherence to the Edwardian terraced houses to the south, and the Victorian buildings on Wilmslow Road, although the context of this area is the modern blocks to the north and south, and on Wilmslow Road.

2.27 The Site generally has no recognisable attributes associated with positive townscape character, aside from the 'green wedge' at the eastern end. There is nothing else about the Site that contributes to a coherent townscape, aside from the enclosure and

definition that the existing building provides to the corner at the junction of Wilmslow and Mosely Roads, and a degree of activity. The building itself appears somewhat dated and it has limited visual/architectural interest, or any attractive qualities/attributes. The townscape in the context of the application does not have attributes indicative of higher townscape values. The listed ecclesiastical buildings to the NW is an exception, albeit this area is physically and perceptually separated from the part of the Site where the Proposed Development would be located.

2.28 Turning then to categories or gradations of townscape value, the examples below cite typical townscape values in a decreasing order of sensitivity/value; it should be noted that the assessment of sensitivity/value may fall between the different levels set out below:

i. **High value**: A townscape largely comprising a world heritage site or a large number of grade I and II* buildings, with a strongly coherent form of development and including buildings of high visual quality.

ii. **Medium value**: A townscape largely comprising a conservation area, open spaces or settled residential areas, with considerable character and coherence evident in the form of development.

iii. **Low value**: A townscape with development of little notable character or coherence, buildings of generally low or mediocre quality, and few if any heritage assets.

2.29 It is not hard to appreciate that the townscape context of the Site in this case is best described at point iii. above. It is to a large extent an unremarkable, everyday townscape of low value, with the Edwardian terraced houses and the Victorian buildings on Wilmslow Road the most coherent part of the townscape, albeit it is not remarkable or of any especially notable value.

2.30 The absence of designations that would indicate a higher value townscape have already been noted. The text Box 5.1 on page 84 of GLVIA3 is tabulated below, with observations about the townscape context of the Site:

Factors that can help in the identification of valued townscapes	**Comment in relation to the Site's townscape context**
Landscape quality (condition): A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.	The local townscape is mixed, and disparate to an extent, but with the Edwardian townscape and the Victorian buildings on Wilmslow Road to the south reasonably coherent, albeit that this is not of particular quality, character or interest. The listed ecclesiastical buildings to the NW indicate

Factors that can help in the identification of valued townscapes	Comment in relation to the Site's townscape context
	higher townscape value, albeit that this is well-separated from the part of the Site where the development is proposed.
Scenic quality: The term used to describe landscapes that appeal primarily to the senses (primarily but not wholly the visual senses).	There is a degree of coherence to the Edwardian/Victorian townscape to the south. However, this cannot be meaningfully described as a townscape of scenic or aesthetic quality. There is again some aesthetic value to the listed Victorian ecclesiastical buildings to the NW, albeit the existing modern building separates these from the part of the Site where the development is proposed.
Rarity: The presence of rare elements or features in the landscape or the presence of a rare Landscape Character Type.	There is nothing rare or noteworthy about the local townscape context of the Site, which is borne out in the general absence of designations (other than the listed ecclesiastical buildings to the NW, as noted above).
Representativeness: Whether the landscape contains a particular character and/or features or elements which are considered particularly important examples.	The local townscape context of the Site is a relatively commonplace example of an evolved, mixed townscape that contains elements of the Edwardian housing and the Victorian buildings on Wilmslow Road to the south, and a mix of buildings elsewhere, including some Victorian remnants.
Conservation interests: The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.	The listed Victorian ecclesiastical buildings to the NW add a degree of townscape value in that area of the surrounding townscape, but they are something of a 'pocket' of good historic buildings in an otherwise mixed and unremarkable townscape.
Recreation value: Evidence that the landscape is valued for recreational activity where experience of the landscape is important.	There is no evidence that the local townscape context is valued for recreational activity, or that the experience of the townscape is important for recreational or amenity value. There are benches to the wedge shaped eastern part of the Site, which adds some low level recreational value to this area for students on the Site.
Perceptual aspects: A landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity.	The only positive perceptual qualities of the local townscape is the 'pocket' of listed ecclesiastical buildings to the NW and, to a lesser degree, the relative coherence of the Edwardian/Victorian townscape to the south.
Associations: Some landscapes are associated with particular people, such as artists or writers, or events in history that	There is no evidence of associations in the local townscape that can be said to contribute to perceptions of beauty or

Factors that can help in the identification of valued townscapes	Comment in relation to the Site's townscape context
contribute to perceptions of the natural beauty of the area.	poignant historic of associations that can be said to elevate the value of the area.

2.31 The value of the townscape in the immediate context of the Site is low, with a medium value to the listed ecclesiastical buildings to the NW, and a low-medium value for the Edwardian/Victorian townscape to the south.

2.32 Turning then to the susceptibility of the townscape to the type of development proposed, it is useful to think of susceptibility as the 'resilience' of the townscape. There is no specific definition of townscape susceptibility. GLVIA 3 describes susceptibility to change of landscape receptors as:

"*… the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies*."

2.33 A highly resilient townscape is one that has a low susceptibility. That means it is readily capable of absorbing the type of change proposed (i.e. the impact) without being degraded by that change (i.e. the effect). Some townscapes have a robust character, such that they could easily accommodate a certain type of change. For example, a mixed townscape may be considered to have a lower susceptibility; this is relevant to the Site, and its context, where the immediate townscape can be described as having a robust character, such that it is resilient and could accommodate changes associated with increased densification, without being harmed or compromised by such changes (i.e. it has a low susceptibility). Other relevant factors may include the coherence of the townscape (which could be disturbed by a proposal), and how the subject site influences the surrounding townscape (e.g. it may be a positive/valued townscape element, the contribution of which might be affected).

2.34 Whilst the Edwardian/Victorian townscape to the south of the Site has some coherence, it is juxtaposed with the existing building on the Site and the Sainsbury's superstore building to the south, amongst other modern developments. That means they are not seen or experienced as separate from modern development. On the contrary, the Edwardian houses are 'bookended' by modern developments to both the north and the south. This area of townscape already contains modern student

accommodation and is readily capable of absorbing the type of change proposed; it has a very low susceptibility.

2.35 In concluding on the sensitivity of the townscape context of the Site, when combining the townscape value with a very low susceptibility to the kind of change proposed, to arrive at a townscape with a very low sensitivity.

THE SENSITIVITY OF THE VISUAL RECPTORS IN THE CONTEXT OF THE APPLICATION SITE

2.36 This section is concluded by briefly considering the sensitivity of the viewers, or 'visual receptors' by combining the value of the views of the Site with the susceptibility of the visual receptors. Firstly, general principles and matters of approach in relation to the value of views are briefly considered (interspersed with general observations about the Site), before specifically turning to the sensitivity of the viewers.

General principles and matters of approach in relation to the value of views

2.37 The value of a view in its existing state, as experienced by a viewer or 'visual receptor' in the location in question, can generally be expressed as high, medium or low (or at an intermediate point between these value levels, e.g. 'low to medium'). The value of view is dependent on:

i. The importance/value of the townscape or view.

ii. The susceptibility to change of the receptor (this includes the nature and expectation of the viewer).

2.38 The importance of a view is determined by any recognition that it may have, the importance of elements within it, and by its amenity value. Recognition includes viewpoints identified by the local authority (or others) in planning documents, and viewpoints visited by large numbers of people. This includes relevant views identified in the Local Plan. In terms of townscape value, recognition includes heritage designations e.g. a conservation area (albeit that not all parts of a conservation will necessarily be of higher value, and not all views within, or out of, a conservation area will necessarily be of a high value).

2.39 In this case the Site does not feature in identified local views, or any important views within a conservation area, or any other heritage asset/designation. The best views of the listed ecclesiastical buildings to the NW of the Site are when looking away from the Site. In any event, what can be seen of the Site alongside the listed buildings is existing corner building, not the area where the development is proposed.

2.40 The value of a view is likely to be higher if it overlooks/includes important heritage assets (see the townscape section above). The value and quality of the view is a reflection of its visual interest, its character and coherence, and any attractive or notable pictorial or compositional qualities it may have.

2.41 In this case, the Site has no recognisable attributes associated with higher value views, and only the Edwardian terraced development to the south comprises, to a limited extent, a reasonably coherent townscape, due to the consistency of the terraced development seen in views. When looking from here in the direction of the Site, the existing modern student accommodation building is seen to terminate the view.

2.42 With regard to amenity value, locations such as parks and riverside walkways, which are used for leisure purposes, are considered to be more sensitive in visual and townscape terms than everyday streetscapes, or areas with no heritage designation.

2.43 In this case, the townscape of the Edwardian terraced development to the south is an everyday streetscape, though local residents (which are more susceptible to change) will use the road. The susceptibility to change of a viewer, or viewers, experiencing a view includes consideration of the nature and expectation of the viewer(s), which reflects the occupation or activity of the people who would experience the view. Those experiencing a view affected by a development are taken to be the general public, taking into account the differing interests and expectations likely to be found in residents, visitors and those who work in a place. For example, people who walk in a park in their leisure time, or people in their street of residence, are likely to have a higher sensitivity than people at their place of work, or people on the move along main roads.

2.44 The assessment of sensitivity (in the case of people, as the visual receptors) is a matter of judgement.

2.45 In respect of views, the overall sensitivity will depend on the susceptibility to change of the people experiencing the view, as previously noted, and the value attached to the views experienced. A view that is notably coherent and characterful, that contains prominent, highly graded heritage assets, and that is from an identified viewpoint location, and is experienced by people with the specific expectation of enjoying the view, is likely to be of high sensitivity.

2.46 A view from a point of some sensitivity, due to heritage designations or amenity value (e.g. conservation areas, open spaces or settled residential areas) and that displays considerable visual interest and compositional quality, and is experienced largely by

residents and people in their leisure time, may typically be considered of medium sensitivity.

2.47 A view that has no particular qualities of character and/or coherence, and that is dominated by buildings of poor or mediocre visual quality, or a view that is transient in nature or from a location within a business or other largely non-residential environment, may be considered of low sensitivity.

2.48 The overall assessment of sensitivity of a view may be moderated to take into account a judgement about the susceptibility to change in the round. For example, a listed building or a part of a conservation area may be a prominent or defining aspect of a view, or conversely it may be present in the view, but only incidentally, or it may contain unremarkable, modern buildings.

2.49 In conclusion, whilst local residents would be receptors of high susceptibility, that does not mean the townscape, in the views they experience, would necessarily have a high susceptibility to the type of change proposed. The townscape, and in particular the Site, has a low townscape value. The presence of the existing modern student accommodation building indicates that the type of development proposed on the Site is already present, and is an existing feature of views in that direction. In short, therefore, even though the local residents are categorised as receptors of high susceptibility, the sensitivity of the viewers (or visual receptors) is low.

3.0 TOWNSCAPE & VISUAL IMPACT ASSESSMENT

ASSESSMNET OF THE PROPOSED DEVELOPMENT

Description of the Proposed Development

3.1 The Proposed Development is illustrated on **Fig 4** below. It is a high quality, contemporary development that arranges the new building on Carill Drive into a two storey brick range, with slightly taller, projecting bays and with a recessed top, clad in zinc shingles. The use of brick as the main material grounds the building in its existing context. There is good detailing and elevational depth, which would add interest and create a play between light and shadow at different angles, and during different light conditions, seasons, and times of day.



Fig 4: A frontal view of the Proposed Development.

3.2 In terms of heights, the top of the proposed building is approximately a storey lower than the eaves of the existing modern student accommodation building. In comparison with the houses on Carill Drive, the 'eaves' level of the Proposed Development roughly corresponds with the eaves of the Edwardian terraced houses. The top of the upper floor roughly corresponds with the ridge heights of the Edwardian terraced houses. The design consciously reflects the rhythm and the bays of the Edwardian terraced houses to the south, as a modern interpretation of the terraced form, but in a very clear and legibly modern design.

3.3 The building positively engages the street with a welcoming, legible entrance. New, high quality hard and soft landscaping is proposed. A hedge would be replanted along Carill Drive, behind a low brick wall and railing. The currently somewhat neglected wedge-shaped area of open space at the eastern end of the Site would be re-landscaped with high quality, appropriate planting.

3.4 The Proposed Development would be of a high standard of design and it would be a positive addition to the architectural quality of the local townscape, especially when seen against the lacklustre backdrop of the rear of the existing building.

Townscape assessment

3.5 This following section assesses the effect of the Proposed Development on the surrounding townscape. In essence, the question to be determined is the degree to which the Proposed Development would fit in with the existing townscape character.

3.6 The proposed building would be a high quality addition to the local townscape that would be very much compatible with the scale of the existing student accommodation building to the immediate north, and the Edwardian terraced houses to the south. The scale and form of the Proposed Development would fit very well into the existing townscape, taking into account the nature of the Site, where the Proposed Development would help to break down the rear of the existing building, and offer interest, activity and enclosure to Carill Drive (this can be seen in the modelled views, which are considered below). Architecturally it would be a high quality contemporary building, and a positive addition to the street, obscuring as it does the lacklustre rear of the existing building.

3.7 The Proposed Development would be visible mostly within the immediate area of Carill Drive, and in views north along Standish Road. When compared with the baseline, there would be an intensification of the existing car parking and hardstanding area, which would be replaced by the new high quality building. However, the building would be a positive addition to the local townscape and it would deliver policy imperatives, in the form of making the best use of brownfield land.

3.8 The leafless views below (**Figs 5 & 6**, from Google Streetview, April 2021) show that the Proposed Development would not be highly visible from Moseley Road. Whilst the building would be perceptible in the view from the NE, it is a relatively fleeting glimpse, in which the existing student accommodation building would be the dominant feature

in the view, and with the Proposed Development forming a transition between it and the Edwardian terraced houses to the south.



Fig 5: An extract from Google Streetview (April 2021) showing that the Proposed Development would not be highly visible from the east on Moseley Road, even in leafless conditions.



Fig 6: An extract from Google Streetview (April 2021) showing that the Proposed Development would not be highly visible from the NE on Moseley Road, even in leafless conditions.

3.9 In the wider townscape, the Proposed Development would not be visible, being lower than the existing building and obscured by it, and being obscured by the buildings on Wilmslow Road to the SW.

3.10 Views are discussed below, but it can be noted that the Proposed Development would in all views be visible alongside the existing student accommodation building. Seen together, the proposed building is subservient to the larger and taller existing building, and of a compatible scale with the roughly corresponds with the eaves of the Edwardian terraced houses.

3.11 The overall effect on the townscape would be positive, through the addition of a good quality new building that is compatible with the existing townscape context.

Visual receptors/views assessment

3.12 **Fig 7** below shows the locations of the views that have been produced to show the Proposed Development in its context.

3.13 For larger scaled development, it is typical to provide existing and proposed views, although in this case the modelling of the views allows for clear distinctions to be made between the existing/emerging townscape and the Proposed Development, so these have not been modelled separately. Likewise, when modelled in that way, each view would be accompanied by text, explaining the situation and components of the views (existing/Proposed Development). In this case each view is accompanied by brief commentary, before an overall summary conclusion on the visual receptors is presented.



Fig 7: A map, showing the viewpoint locations used in the views assessment.



View 1 From near the junction of Wilmslow Road Carill Drive to the SW of the Site.

3.14 **View 1**: The view is from junction of Wilmslow Road Carill Drive to the SW of the Site. The view shows, in the foreground on the right, the Victorian corner (former) bank, and beyond it the Edwardian terraced houses on Carill Drive. At this angle, the existing building on the Site that forms the immediate context of the Proposed Development is not readily visible, being largely obscured by the proposed intervening block, although its roof can just be seen beyond the tree on the left.

3.15 From this viewpoint the Proposed Development is seen alongside the Edwardian terraced houses on the south side of Carill Drive. The existing building on the Site presently provides some visible context of height/scale in the view, although it is the somewhat drab rear elevations that are seen. These would be replaced with the Proposed Development, in the form of a modern terraced block. In this view the Proposed Development would fit well into what is evidently a mixed townscape. The Proposed Development sits comfortably in the view and would form part of a more coherent development along Carill Drive. Architecturally, the new building, in place of the rear elevations of the existing building on the Site, would enhance the local townscape.



View 2 From Carill Drive to the SE of the Site.

3.16 **View 2**: The view is from Carill Drive to the SE of the Site. The view shows the Edwardian terraced houses on Carill Drive in the foreground and middle ground on the left. At this angle, the existing building on the Site that forms the immediate context of the Proposed Development is not readily visible, being largely obscured by the proposed intervening block, although it can be seen on both sides of the proposed new building.

3.17 From this viewpoint the Proposed Development is seen in place of the rear elevation of the existing building on the Site, alongside the Edwardian terraced houses on the south side of Carill Drive. The existing building on the Site presently provides some visible context of height/scale and modern development in the view, although it is unfortunately the somewhat drab rear elevations and car parking area that are seen. These would be replaced with the Proposed Development, in the form of a good quality modern terraced block. In this view the Proposed Development would fit well into what is evidently a mixed townscape. The Proposed Development forms a transition between the existing building on the Site and the Edwardian terraced houses on Carill Drive. The view shows how it sits comfortably in the view and would form part of a more coherent development along Carill Drive. Architecturally, the new building, in place of the rear elevations of the existing building on the Site, would enhance the local townscape.

3.18 **Summary conclusion on views/visual receptors**: The views have shown that the Proposed Development would fit well into the surrounding townscape. It is a complementary addition to the otherwise somewhat bland and dated existing student accommodation building. In this respect it would make for a positive and compatible addition to the local townscape, with no indications of excessive height or scale. It would generally sit comfortably in the local context, when seen from a variety of locations.

4.0 HERITAGE ASSESSMENT

Heritage assets

4.1 As has been noted in the previous section, there are no heritage designations covering the Site. The local area is not in, or near, a conservation area. There is a group of three listed buildings to the NW of the application site (see **Fig 8** below) and a listed synagogue further west on Wilbraham Road.

4.2 The map extract from Historic England's online National Heritage List map (**Fig 8**) shows the locations of the nearby listed buildings with blue markers; the listed buildings are all grade II listed and they are listed below, from west to east:

i. The Church of the Holy Innocents and St James.

ii. The Fallowfield War Memorial.

iii. The former Sunday School, now in restaurant/bar use and listed as the 'Queen of Hearts Public House'.

4.3 However, the existing intervening student accommodation buildings on the Site separates the listed buildings from the area where the Proposed Development would be location, and there is no co-visibility between the listed buildings and the Proposed Development (**Photo 15**).



Fig 8: An extract from Historic England's online National Heritage List map, showing the locations of the listed buildings with blue markers, and with the approximate location of the Site outlined in red.



Photo 15: An aerial view looking NW towards the Church of the Holy Innocents and St James, and the former Sunday School (largely obscured by trees) from above the SW corner of the Site. The listed war memorial in the churchyard is not visible in the view.

Methodology/approach

4.4 The heritage assessment was informed by site visits and desk-based documentary research. Photos were taken on the site visit, including drone photography.

4.5 The assessment follows the basic, stepped approach propagated in Historic England's guidance on setting, *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*, (Historic England, 2017, second edition) ('GPA3'), albeit slightly adapted. The stepped approach GPA3 is set out below:

Step 1: identify which heritage assets and their settings are likely to be affected;

Step 2: summarise the heritage significance of the heritage asset;

Step 3: summarise the contribution to the setting to the heritage significance of the heritage asset;

Step 4: assess the likely potential effects of the proposed development on heritage significance; and

Step 5: explore the potential ways to avoid or minimise harm (note that for some developments, this may not be possible due to the nature of the development).

4.6 For this assessment, the GPA3 Step 1 assessment was broken down into two parts, or stages. The first stage of the GPA3 Step 1 assessment, undertaken as part of this assessment, involved a desk-based exercise whereby the heritage assets in the area around the Site were identified. The nature of the Proposed Development, in combination with observations about intervening development/features/vegetation, distance from the Site, and digital modelling, were then used determine whether effects on the setting/heritage significance of the heritage assets in the surrounding area could likely be anticipated.

4.7 The GPA3 Step 1 assessment included considering the nature of the heritage asset and its heritage significance (e.g. certain types of structures, such the listed Fallowfield War Memorial, are unlikely to be affected by the distant presence of a new development), the nature of its setting (e.g. intervening townscape, and/or presence of other modern buildings, such as the existing building on the Site) and the degree of change that would likely result from the Proposed Development (bearing in mind that change does not necessarily equate to harm to heritage significance). The heritage assets have been grouped, where relevant, for ease of reference, but in all cases individual heritage assets are identified and discussed, as appropriate. That accords with the need for proportionality, as set out at paragraph 21 of GPA3.

4.8 The second stage of the GPA3 Step 1 assessment, undertaken as part of this assessment, involved a site visit see the heritage assets, and/or their settings and experience the situation on the ground. Where it was considered that impacts could be anticipated, following the GPA3 Step 1 assessment, the relevant heritage assets were brought forward for more a detailed assessment in this chapter, using Steps 2 and 3 of GPA3. The assessment is proportionate to the heritage significance of the heritage asset, and sufficient to understand the potential impact of the Proposed Development on its heritage significance.

4.9 The setting of heritage assets is not necessarily or exclusively confined to visual matters or views. Abstract historical associations may, in some cases, form part of setting, but no such associations that extend from any heritage asset to the Site have been identified in this case.

4.10 In accordance with the Step 1 assessment process, the three listed buildings to the NW have not been brought forward for a detailed assessment, given that the Proposed Development would not be visible from them, and it would be a marginal and inconsequential part of the wider *experience* of the townscape beyond the listed buildings, and no meaningful historic associations between the listed buildings and the location of the Proposed Development would be affected.

4.11 Similarly, there are no indications that any effects on the more distant synagogue, to the west on Wilbraham Road, or Norton Place, at 359-363 Wilmslow Road to the SW.

5.0 SUMMARY CONCLUSIONS

TOWNSCAPE & VISUAL

Townscape

5.1 The local townscape context is mixed. To the north of the Site is Manchester University's Fallowfield Campus. A small group of three listed buildings to the NW makes up a pocket of Victorian ecclesiastical townscape to the NW of the Site. The townscape on the south side of Wilbraham Road is more mixed. Wilmslow Road contains a mix of modern development and some residual Edwardian/Victorian terraces, and a former bank at the junction with Carill Drive. Carill Drive is fronted with red brick Edwardian terraced houses of similar design, and these extend southwards into Standish Road.

5.2 The value of the townscape in the immediate context of the Site is low, with a medium value to the listed ecclesiastical buildings to the NW, and a low-medium value for the Edwardian terraced development to the south.

5.3 When combining the townscape value with a very low susceptibility to the kind of change proposed, to arrive at a townscape with a very low sensitivity.

5.4 The Proposed Development would in all views be visible alongside the existing student accommodation building. Seen together, the proposed building is subservient to the larger and taller existing building, and of a compatible scale with the roughly corresponds with the eaves of the Edwardian terraced houses. It makes for a transition between the existing building on the Site, and the Edwardian terraced houses. The overall effect on the townscape would be positive, through the addition of a good quality new building that is compatible with the existing townscape context.

Visual

5.5 The Site does not feature in identified local views, or any important views within a conservation area, or any other heritage asset/designation. The Site has no recognisable attributes associated with higher value views, and only the Edwardian terraced development to the south comprises, to a limited extent, a reasonably coherent townscape, due to the consistency of the terraced development seen in views. The townscape of the Edwardian terraced development to the south is

nevertheless an everyday streetscape, though local residents (which are more susceptible to change) will use the road.

5.6 Whilst local residents would be receptors of high susceptibility, that does not mean the townscape, in the views they experience, would necessarily have a high susceptibility to the type of change proposed. The townscape, and in particular the Site, has a low townscape value. The presence of the existing modern student accommodation building indicates that the type of development proposed on the Site is already present, and a feature of views in that direction. In short, therefore, even though the local residents are categorised as receptors of high susceptibility, the sensitivity of the viewers (or visual receptors) is low.

5.7 The views have demonstrated that the Proposed Development would be a good quality and compatible addition to the local townscape that would sit comfortably in its context, with no wide ranging visibility.

HERITAGE

5.8 Following the GPA3 Step 1 assessment (including a site visit), no heritage assets have been taken forward for a detailed assessment, as no effects on their significance can be anticipated.

OVERALL SUMMARY

5.9 The design quality of the Proposed Development satisfies the provisions of Chapter 12 of the NPPF.

5.10 Because there is no harm to heritage assets, means paragraphs 206-208 in Section 16 of the NPPF are not engaged.

5.11 This also means that the provisions of s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) are satisfied.

APPENDIX 1: POLICY OVERVIEW

LEGISLATION

1. Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act). Section 66(1) of the Act sets out the statutory duty in relation to development affecting the setting of listed buildings and section 72(1) sets out the statutory duty in relation to any buildings or other land in a conservation area.

2. It is a well-established concept in case law that 'preserving' means doing no harm for the purposes of the 1990 Act. The Court of Application's decision in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] (EWCA Civ 137) established that, having 'special regard' to the desirability of preserving the setting of a listed building under s.66, involves more than merely giving weight to those matters in the planning balance. There is a strong statutory presumption against granting planning permission for any development which would fail to preserve a listed building or its setting (and the same for conservation areas). In cases where a proposed development would harm a listed building or its setting (or a conservation area), the Barnwell decision has established that the duty in s.66 of the Act requires these must be given "*considerable importance and weight*". The character or appearance of land in a conservation area attract a similar duty under s.72 of the Act.

3. The key legal principles established in case law are:

    i. 'Preserving' for the purposes of the s.66 and s.72 duties means 'to do no harm'.

    ii. The desirability of preserving the setting of a listed building, or the character or appearance of a conservation area must be given 'considerable importance and weight'.

    iii. The effect of NPPF paragraphs 205-208 is to impose, by policy, a duty regarding the setting of a listed building that is materially identical to the statutory duty pursuant to s.66(1) regarding the setting of a listed building (and s.72 in relation to the character and appearance of a conservation area)[1].

    iv. NPPF paragraph 208 appears as part of a 'fasciculus' of paragraphs, which lay down an approach corresponding with the s.66(1) duty (and similarly the s.72 duty)[2].

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[1] *Jones v Mordue* [2015] EWCA Civ. 1243 per Sales LJ [at 28].

[2] *Jones v Mordue* [at 28] per Sales LJ.

v. If harm would be caused, then the case must be made for permitting the development in question, and the sequential test in paragraphs 206-208 of the NPPF sets out how that is to be done. If that is done with clarity, then approval following paragraph 208 is justified. No further step or process of justification is necessary[3].

vi. In cases where there may be both harm and benefits, in heritage terms, great weight has to be given to the conservation and enhancement of a listed building, and its setting, and the preservation and enhancement of a conservation area. It is possible to find that the benefits may be far more significant than the harm[4].

vii. An impact is not to be equated with harm; there can be an impact which is neutral (or indeed positive)[5].

NATIONAL

National Planning Policy Framework

4. The revised National Planning Policy Framework (the NPPF) was published in December 2023 and constitutes guidance for local planning authorities and decision makers. Applications for planning permission must be determined in accordance with the Development Plan, unless it is silent, or material considerations indicate otherwise.

5. The NPPF is a material consideration.

6. Chapter 12 of the NPPF deals with achieving well designed places. Paragraph 131 highlights that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development.

7. Paragraph 135 states that planning policies and decisions should ensure that developments:

   a) will *function well* and *add to the overall quality of the area*, not just for the short term but over the lifetime of the development;

[3] *R (Pugh) v Secretary of State for Communities and Local Government* [2015] EWHC 3 (Admin) as per Gilbart J [at 53].

[4] *R (Safe Rottingdean Ltd v Brighton and Hove CC* [2019] EWHC 2632 (Admin) as per Sir Ouseley [at 99].

[5] *Pagham Parish Council v Arun District Council* [2019] EWHC 1721 (Admin) (04 July 2019), as per Andrews, J DBE at 38.

b) are *visually attractive* as a result of good architecture, layout and appropriate and effective landscaping;

c) are *sympathetic to local character and history*, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) *establish or maintain a strong sense of place*, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) *optimise the potential of the site* to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users49; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

8. Paragraph 137 requires design quality to be considered throughout the evolution and assessment of proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. In this case there has been pre-application engagement with the Council, which is set out in more detail in the Planning Statement.

9. Section 16 of the NPPF deals with conserving and enhancing the historic environment, in paragraphs 195 to 214. Paragraph 195 of the NPPF states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

10. According to paragraph 200 applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

11. According to paragraph 205, which applies specifically to designated heritage assets, great weight should be given to a heritage asset's conservation (the more important the asset, the greater the weight should be). This reflects the provisions of the 1990 Act in

that it applies irrespective of whether it involves total loss, substantial harm, or less than substantial harm to significance.

12. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. It then deals with substantial harm to, or total loss of significance of, different types of designated heritage assets. Paragraph 207 continues on the subject of substantial harm.

13. Paragraph 208, on the other hand, deals with less than substantial harm. Harm in this category should be weighed against the public benefits of the proposal. The National Planning Practice Guidance (NPPG) describes public benefits as "*anything that delivers economic, social or environmental progress*".

National Design Guide

14. The National Design Guide provides guidance on good design. Paragraph 39 notes that understanding the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of well-designed new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities.

15. Paragraph 40 lists the following characteristics of well-designed places, which should be:

    i. based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;

    ii. integrated into their surroundings so they relate well to them;

    iii. influenced by and influence their context positively; and

    iv. responsive to local history, culture and heritage.

16. Paragraph 44 highlights that well-designed places do not need to copy their surroundings in every way. It is appropriate to introduce elements that reflect how we live today, to include innovation or change such as increased densities, and to incorporate new sustainable features or systems.

17. Paragraph 49 notes that today's new developments extend the history of the local context. The best developments will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century. As an emerging pattern of

development, the Proposed Development fits into an evolving townscape that is in the process of 'extending the history' of the local townscape.

18. Paragraph 51 notes that well-designed places, buildings and spaces:

    i. have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion;

    ii. have a character that suits the context, its history, how we live today and how we are likely to live in the future; and

    iii. are visually attractive, to delight their occupants and other users.

19. Paragraph 52 notes that local identity is made up of typical characteristics, such as the pattern of housing.

20. Paragraph 54 highlights that all design approaches and architectural styles are visually attractive when designed well.

21. According to paragraph 57, materials, construction details and planting in well-designed places are selected with care for their context. They are attractive but also practical, durable and affordable. They contribute to visual appeal and local distinctiveness. In well-designed buildings, the materials and details suit the design concept.

22. Paragraph 59 acknowledges instances where the scale or density of new development is very different to the existing. It notes that in such cases, it may be more appropriate to create a new identity rather than to scale up the character of an existing place in its context. This is relevant to the Proposed Development, where it differs in scale compared with the two storey houses on Recreation Avenue; the Proposed Development has been designed to be different, albeit broadly compatible, with the traditional architecture and scale of these houses.

23. Paragraph 67 highlights that well-designed places use the right mix of building types, forms and scale of buildings and public spaces for the context and the proposed density, to create a coherent form of development that people enjoy. They also adopt strategies for parking and amenity that support the overall quality of the place.

THE DEVELOPMENT PLAN

Core Strategy July 2012

24. Core Strategy (July 2012) Policy CC 9 deals with design and heritage, and is quoted below:

"***Design and Heritage***

Design of new buildings will need to be of the highest standard in terms of appearance and function. The standards and guidance explained in other LDF policies should be the basis for the approach to design, with particular attention to be given to the City Centre context and character.

Development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments.

The Council will support high density and mixed use development in the City Centre, but developers must recognise the specific design challenges that must be overcome to ensure complementarity of function and form. New development must support the range of uses the Council expects in the City Centre and contribute to a coherent and integrated physical environment."

25. Core Strategy Policy EN 3 deals with design and heritage, and is quoted below:

"***Policy EN 3***

Heritage

Throughout the City, the Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods, including those of the City Centre.

New developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance, including scheduled ancient monuments, listed buildings, registered parks and gardens, conservation areas and archaeological remains.

Proposals which enable the re-use of heritage assets will be encouraged where they are considered consistent with the significance of the heritage asset."

26. Manchester's *Places for Everyone Joint Development Plan Document* (March 2024) Policy JP-P2 deals with heritage and is quoted below:

"***Policy JP-P2: Heritage***

We will proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and their settings. Opportunities will be pursued to aid the promotion, enjoyment, understanding and interpretation of heritage assets, as a means of maximising wider public benefits and reinforcing Greater Manchester's distinct character, identity and sense of place.

Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for conserving and enhancing in the future and demonstrate a clear understanding of the historic environment and the heritage values of sites, buildings or areas and their relationship with their surroundings. This knowledge should be used to inform the positive management and integration of our heritage by:

1. *Setting out a clear vision that recognises and embeds the role of heritage in place-making;*
2. *Ensuring that the heritage significance of a site or area is considered in accordance with national planning policy in the planning and design process and opportunities for interpretation and local engagement are optimised;*
3. *Integrating the conservation and enhancement of heritage assets and their settings, with creative contextual architectural responses that contribute to their significance and sense of place;*
4. *Delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing; and*
5. *Exploring opportunities to reduce greenhouse gas emissions that restoration of historic buildings offer.*

Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings, and areas of identified archaeological, architectural, artistic and/or historic value.

Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.

Where heritage assets have been identified as being at risk, Local Plans should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use. Development proposals which will help safeguard the significance of and secure a sustainable future for Greater Manchester's heritage at risk will be supported in principle, provided they are not contrary to national policy or other policies in the development plan.

Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process."