

24 KINGSTON ROAD DIDSBURY, MANCHESTER HERITAGE ADDENDUM



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Section 1 Introduction

This Heritage Addendum has been prepared to accompany the section 73 application for the minor amendment to approved planning application (ref:138772/JO/2023) for the addition of 2 mechanical plant units for domestic heating and cooling on the rear elevation of the property (on the garage / garden wall). This is an addendum to the Heritage Statement prepared by Stephen Bradwell, MA MRTPI IHBC in October 2019, for the approved application.

This Heritage Addendum will provide additional information in relation to the proposed changes to the approved application only.

This Heritage Addendum has been prepared in accordance with the NPPF and the NPPG. It has been prepared by Kathryn Sather & Associates, Heritage Conservation Consultants. This Heritage Addendum aims to provide sufficient information specific to the proposal site and its immediate surroundings. To this end the Heritage Addendum provides a brief description of the proposal site; an assessment of the significance of 24 Kingston Road and its contribution to the St James Conservation Area; a summary of the proposed works and a heritage impact assessment describing the impact that the proposed development will have on the character of the Conservation Area.

Section 2 Planning Policy Context

2.1 Introduction

Both national and local planning policies and guidance affect the planning policy context for the proposal site. These include the Manchester Local Development Framework Core Strategy Development Plan Document, Extant Unitary Development Plan Policies, Places for Everyone Joint Development Plan Document 2022 To 2039, NPPF Chapter 16, the NPPG and guidance from Historic England.

2.2 Manchester Local Development Framework (LDF) Core Strategy 2012

The Core Strategy was adopted by Manchester City Council on 11th July 2012. It is the key document in Manchester's Local Development Framework and covers a period of 15 years from 2012 to 2027. Relevant policy includes:

Policy EN3 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 consistent with the significance of the heritage asset.

2.3 Manchester Unitary Development Plan (1995) Extant Policies

One of the objectives of this plan was 'to protect and enhance Manchester's Victorian, Edwardian and Georgian architectural and historic heritage.' Many policies have been replaced by the Core Strategy (2012) however Policy DC18 on Conservation Areas and Policy DC19 on Listed Buildings within the citywide Developmental Control Policies remain valid.

DC18.1 Conservation Areas

The Council will give particularly careful consideration to development proposals within Conservation Areas.

a. The Council will seek to preserve and enhance the character of its designated conservation areas by carefully considering the following issues:

- i) the relationship of new structures to neighbouring buildings and spaces;
- ii) the effect of major changes to the appearance of existing buildings;
- iii) the desirability of retaining existing features, such as boundary walls, gardens, trees, (including street trees);
- iv) the effect of signs and advertisements;
- v) any further guidance on specific areas which has been approved by the Council.

b. The Council will not normally grant outline planning permission for development within Conservation Areas.

c. Consent to demolish a building in a conservation area will be granted only where it can be shown that it is wholly beyond repair, incapable of reasonably beneficial use, or where its removal or replacement would benefit the appearance of character of the area.

d. Where demolition is to be followed by redevelopment, demolition will be permitted only where there are approved detailed plans for that redevelopment and where the Council has been furnished with evidence that the development will be undertaken.

e. Development proposals adjacent to Conservation Areas will be granted only where it can be shown that they will not harm the appearance or character of the area. This will include the protection of views into and out of Conservation Areas.

2.4 Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 To 2039 (Adopted 21 March 2024)

Places for Everyone is a long-term plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth. It has been published by the GMCA on behalf of the nine districts. The plan is a joint development plan of the nine districts which will determine the kind of development that takes place in their boroughs, maximising the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development. The Places for Everyone Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on March 21, 2024.

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 placemaking, 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.

2.5 The Planning (Listed Building and Conservation Areas) Act 1990

Local Planning Authorities have statutory duties regarding decisions involving heritage assets. The following provisions are relevant to the site:

Section 66 (1) of the Planning (Listed Building & Conservation Areas) Act 1990 states: 'in granting planning permission for development which affects a listed building or its setting,' a LPA must have 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

Section 72: 'General duty as respects conservation areas in exercise of planning functions. In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

2.6 National Planning Policy Framework and National Planning Practice Guidance

Chapter 16 of the NPPF, 'Conserving and enhancing the historic environment', provides the policy framework for the conservation of the historic environment. The following guidance is relevant to the application site.

Proposals affecting heritage assets

207. In determining applications, local planning authorities should require an applicant to 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

210. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the

asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

214. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

217. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

218. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

219. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

2.7 Other National Guidance Documents: Historic England

Several Historic England documents provide relevant guidance. These include *Statements of Heritage Significance: Analysing Significance in Heritage Assets* Historic England Advice Note 12 (2019) and *Local Heritage Listing: Identifying and Conserving Local Heritage* Historic England Advice Note 7 2nd Edition (2021).

Section 3 Description and History of the Proposal Site

3.1 Location and Setting

The proposal site is located in the village of Didsbury a suburb to the south of Manchester City Centre. Kingston Road lies to the south of the village centre running south from Wilmslow Road. The rear of the proposal site is along Millgate Lane which runs parallel to Kingston Road. Across Millgate Lane from the rear of the property is the Alpine Tea Room to the Fletcher Moss Botanical Garden. The general topography of the site is a gentle slope from north to south along Kingston Road and Millgate Lane.



Existing Location Plan

3.2 24 Kingston Road

3.2.1 Plan and Form

The previous Heritage Statement describes the property as:

'The existing property consists of a mid to late 19th century, 3-storey terraced dwelling that fronts onto Kingston Road, with a rear garden that extends onto Millgate Lane, which lies about 3m below the level of the garden.'

3.2.2 Rear Boundary Wall to the West

This application is for the proposed works to the external face of the rear boundary wall to the proposal site which is located along Millgate Lane. The entrance door to the garage is placed nearer to the northern end of the rear boundary wall which is slightly set back from the edge of the lane, with stone setts in front. To the south of the garage door is a narrow opening for pedestrian access to the garage. The lane curves away from the property as it descends down to the south. The rear boundary wall to the adjacent property, 22 Kingston Road to the north, steps out to the west in relation to the proposal site, as does the proposal site in relation to the adjacent property to the south.



West Boundary to Proposal Site Along Millgate Lane



West Boundary to Proposal Site from the North



West Boundary to Proposal Site from the South (Rear Walls Step Out)

Section 4 Contribution of the Proposal Site to the Setting of the Heritage Assets

4.1 Identification of the Nearby Listed Buildings

The previous Heritage Statement (Bradwell 2019) identifies that there are three listed buildings in the vicinity of the proposal site:

- *'nos. 7 - 13, Millgate Lane - four early to mid 19th century cottages about 100 m to the north of no. 24, Kingston Road;*
- *nos. 15 - 17, Millgate Lane - a pair of late 18th century cottages about 60 m to the south of no. 24, Kingston Road;*
- *no. 40, Kingston Road - a modern single storey, detached house, c. 1962-3, about 80m to the south of no. 24, Kingston Road.'*

4.2 Contribution of the Proposal Site to the Setting of the Listed Buildings

The Heritage Statement (Bradwell 2019) goes on to identify that the proposal site is not within the setting of these heritage assets, which has been accepted by the local authority at the previous planning application stage and therefore the impact on setting of the nearby listed buildings will not be assessed further here.

'Impact on the Setting of the Listed Buildings

6.2 The application site is not seen in the context of any of the neighbouring listed buildings, and the surroundings of these listed properties are generally defined by their position within the overall streetscene to Millgate Lane and Kingston Road.

6.3 The application site has no known historical or functional associations with any of these listed buildings and the proposed extensions to no. 24, Kingston Road will not obstruct any views either towards or from these listed buildings or encroach into their present surroundings. It is therefore considered that given the relative distance between the application site and these listed buildings, and the intervening development, the proposed development will not affect the setting of these properties, or their overall significance.'

Section 5 Assessment of the Special Interest of the Conservation Area

5.1 Key Elements Which Define Special Interest

The previous Heritage Statement (Bradwell 2019) contains a summary of the Conservation Area and its special interest:

5.3 Whilst the existing property is not listed, it does lie within the Didsbury St James Conservation Area, which was designated in November 1970. The area covers the historical core of Didsbury, at the junction of Wilmslow Road and Stenner Lane, and includes the residential properties located between Kingston Road and Millgate Lane that extend in a linear fashion to the south of Wilmslow Road.

5.4 The Council's (on-line) conservation area assessment notes that the quality of the built environment and the setting of buildings within this Conservation Area is of a very high standard, and a similar high standard will be expected of any proposals for new development. It also notes that the existing well-treed suburban character of the Conservation Area should be maintained.

5.2 Contribution of the Proposal Site to the Character and Appearance of the Conservation Area

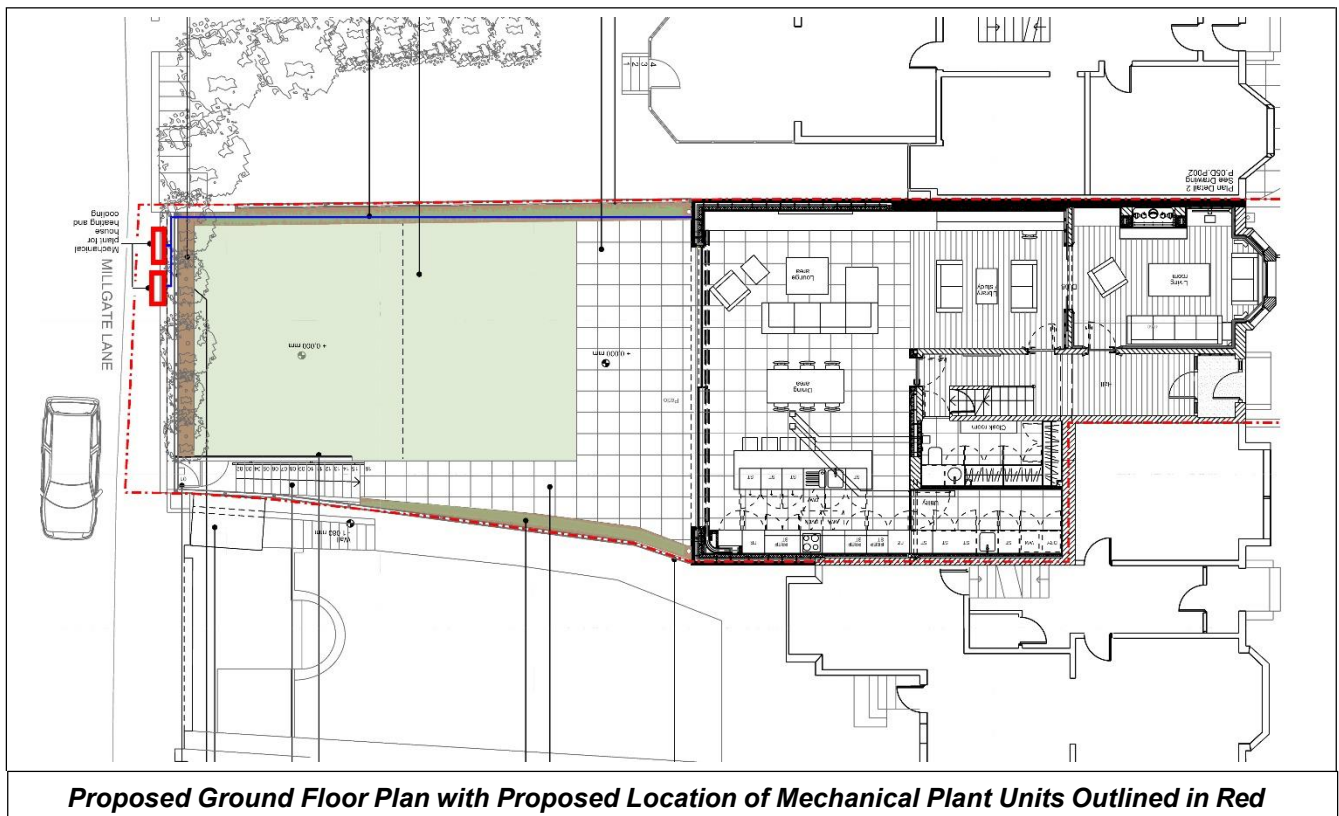
The previous Heritage Statement (Bradwell 2019) assesses the contribution of the proposal site to the Conservation Area as:

6.4 This property is part of an established frontage to Kingston Road and given its historical development and position within the street scene its front elevation is a prominent feature in the Conservation Area and as such makes a positive contribution to its character and appearance. The rear elevation of the property is however of lesser interest, it was not designed to be seen and it is not particularly prominent in the Conservation Area, being largely screened from any view by the change of levels between the site and Millgate Lane. It therefore makes little contribution to the overall character or appearance of the Conservation Area, and as the NPPF recognises not all elements of a conservation area will necessarily contribute to its significance.

Section 6 Proposed Works

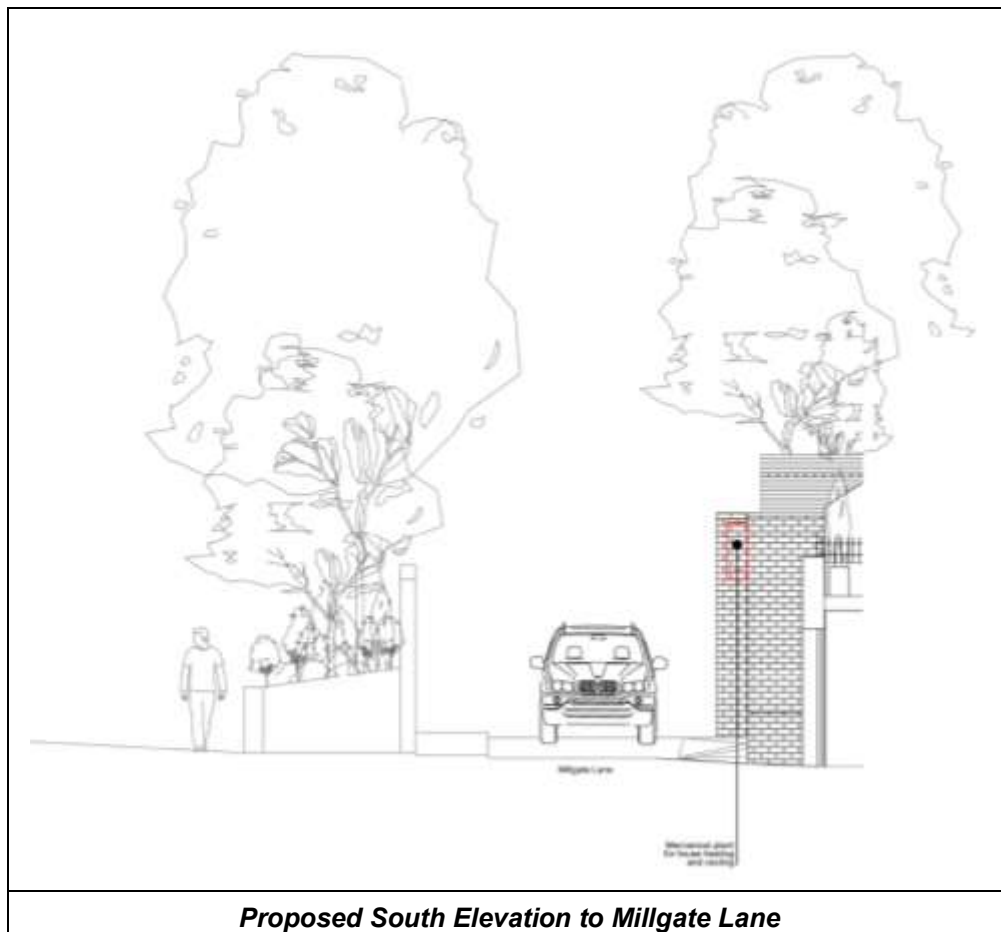
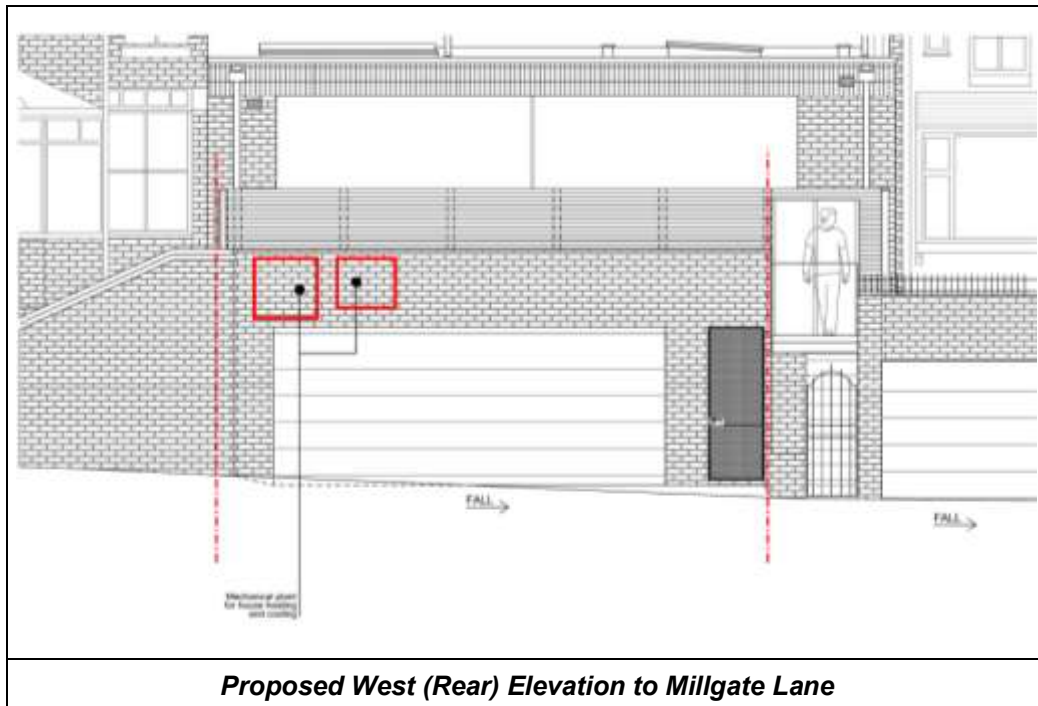
6.1 Overview

The proposed works seek the minor amendment to the approved planning application (ref:138772/JO/2023) for the addition of 2 mechanical plant units on the rear elevation of the property at 24 Kingston Road, Didsbury (on the garage / garden wall). The rear garage wall runs along Millgate Lane to the west of the property. The mechanical plant units for house heating and cooling are proposed to be wall mounted above the north end of the garage door adjacent to the recess to the rear boundary wall to the adjacent property 22 Kingston Road which steps out slightly into Millgate Lane.



6.2 Design and Materials

The mechanical plant units will be constructed of metal housing. The proposed units are proposed to be brick in colour, chosen to complement the colour palette of the rear boundary wall. The specific location of the units has been chosen so that the units will not protrude further than the adjacent brick boundary wall, which protrudes towards the road. From either direction, the units will not be readily visible due to the colour which will be similar to the brick wall, and the position of the brick wall to the adjacent plot which will effectively hide the units in views from either direction along the road.



6.3 Access and Parking

The existing access and parking to the property will be unchanged by the proposed works.

Section 7 Heritage Impact Assessment

7.1 Method of Assessment

The following assessment identifies the impact of the proposals for 24 Kingston Road on the significance of the Didsbury St James Conservation Area, which is the designated heritage asset. The assessment of impact on the Conservation Area is achieved by considering the effects of the proposals on the elements that constitute special interest within the Conservation Area, as laid out in the Historic England Guidance.

The impact of the proposed works has also been assessed using a cultural heritage impact assessment methodology based upon the ClfA/ IHBC/ IEMA guidance, *Principles of Cultural Heritage Impact Assessment in the UK* of July 2021, a methodology commonly used to assess heritage impact which is endorsed by several professional heritage organisations. This methodology sets out three stages of evaluating the consequences of change:

- Understanding change (a factual statement of how a proposal would change a cultural heritage asset or its setting, including how it is experienced).
- Assessing impact (an assessment of the degree to which any change would impact cultural significance).
- Weighting the effect (a conclusion regarding whether an impact matters, reflecting the importance of the affected cultural heritage asset).

A brief explanation of the HIA methodology is set out in Appendix 1.

7.2 Impact of the Proposed Works to the Significance of the Conservation Area

24 Kingston Road is not assessed as being a positive building within the Conservation Area. Due to the step back from the adjacent property the mechanical plant units will not be visible from the north. As the Millgate Lane curves away from the property as it descends, the mechanical plant units will not be readily visible from the south until in close range to the garage wall.



Looking South Along Millgate Lane



Looking North Along Millgate Lane

The proposed addition of the mechanical plant units to the garage wall to the rear of the property will have no impact on the character, architectural quality and built form of the Conservation Area. There will be no change to the scale, massing and architectural style of the existing house as well as other buildings within the Conservation Area. The proposed use of a brick coloured material reflects the visual character of the brick walls in this area of the Conservation Area. The proposals will also not affect the significance or the elements of the Conservation Area that contribute to the special historic interest of the area. The proposals will cause no harm to the significant views into or within the Conservation Area.

Impact on General Character and Uses

The proposed two mechanical plant units will not alter the general character and uses of the Conservation Area, as the proposed use will remain residential as existing.

Impact on Historic Interest

The proposed works will have no impact upon the historic character of the Conservation Area as the historic listed buildings and positive contributors in the vicinity will remain unaffected.

Impact on Architectural Interest and Built Form

The positioning and colour of the mechanical plant units ensures that they are contextual to the built form and architectural interest of the Conservation Area. They will not be seen from any identified important views within or into the Conservation Area and will have a neutral impact on the overall architectural interest of the area.

Impact on Spatial Analysis

The plot ratios in the Conservation Area immediately surrounding 24 Kingston Road will be unaffected by the proposed works. Therefore the development will have a neutral impact on the spatial qualities of the Conservation Area.

Impact on Streets and Trees

There will be no impact on the trees or the streets of the Conservation Area.

Impact on Setting and Views

The proposal site is situated within the Conservation Area, and therefore the proposals will have no impact on the setting of the Conservation Area. There are no important views identified which include the proposal site, and the proposed works will have no impact on the important views within, into or out of the Conservation Area.

7.3 Summary of Impact

Overall, the proposed mechanical plant units will have no impact on the historic significance, architectural quality or built form of the Conservation Area. The proposed works will have no impact upon any significant views within the Conservation Area. Didsbury St James Conservation Area is assessed as having a medium value in line with the heritage impact assessment guidance, as it is a Conservation Area containing buildings that contribute significantly to its historic character. The proposed works will overall have a negligible magnitude of change upon the Conservation Area, as the mechanical plant will be carefully designed so as to preserve the architectural quality and built form of the Conservation Area. Following the heritage impact assessment methodology, the significance of a change of a negligible magnitude to a heritage asset of medium value would constitute a neutral impact. As the proposed works will not cause harm to the Conservation Area, paras 213 to 215 of the NPPF, which discuss substantial harm or less than substantial harm do not apply here. This assessment is in accordance with the definition of 'preserving' as summarised by Lord Justice Lewison in *Palmer v Herefordshire Council & Anr* [2016] EWCA Civ 1061: 'In this context the concept of "preserving" the building or its setting means "doing no harm"'.

7.4 Heritage Impact Assessment Tables

The following table sets out the proposed works which could impact on the significance of the heritage asset, identifying the significance, magnitude of the change, the weight of impact of the proposed alterations and proposed mitigation if required.

PROPOSED WORK	SIGNIFICANCE OF THE AFFECTED ASSET	MAGNITUDE OF IMPACT/CHANGE	WEIGHT OF EFFECT/IMPACT OF WORK & PROPOSED MITIGATION
Addition of 2 mechanical plant units on the rear elevation of the property at 24 Kingston Road, Didsbury (on the garage/garden wall).	Didsbury St James Conservation Area: Medium	Negligible: The addition of the mechanical plant units to the rear garage wall is a slight change to the heritage asset that makes a negligible magnitude of change to its cultural significance.	Neutral Impact: The existing property at 24 Kingston Road is not identified as a positive contributor to the Conservation Area nor are any views to the rear of the property identified as significant. The mechanical plant units will be hidden by the recess to the neighbouring rear boundary wall when viewed from the north. Therefore the addition of these structures does not have any adverse impact on the character, appearance and significance of the Conservation Area.

Section 8 Conclusions

8.1 The Proposed Works

The proposed works seek the minor amendment to the approved planning application (ref:138772/JO/2023) for the addition of 2 mechanical plant units for heating and cooling on the rear elevation of the property at 24 Kingston Road, Didsbury (on the garage / garden wall). The rear garage wall runs along Millgate Lane to the west of the property. The mechanical plant for house heating and cooling are proposed to be wall mounted above the north end of the garage door adjacent to the recess to the rear boundary wall to the adjacent property 22 Kingston Road which steps out slightly into Millgate Lane.

8.2 Impact of Proposed Works to the Significance of the Heritage Asset

Overall, the proposed mechanical plant units will have no impact on the historic significance, architectural quality or built form of the Conservation Area. The proposed works will have no impact upon any significant views within the Conservation Area. Didsbury St James Conservation Area is assessed as having a medium value in line with the heritage impact assessment guidance, as it is a Conservation Area containing buildings that contribute significantly to its historic character. The proposed works will overall have a negligible magnitude of change upon the Conservation Area, as the mechanical plant will be carefully designed so as to preserve the architectural quality and built form of the Conservation Area. Following the heritage impact assessment methodology, the significance of a change of a negligible magnitude to a heritage asset of medium value would constitute a neutral impact. As the proposed works will not cause harm to the Conservation Area, paras 213 to 215 of the NPPF, which discuss substantial harm or less than substantial harm do not apply here. This assessment is in accordance with the definition of ‘preserving’ as summarised by Lord Justice Lewison in *Palmer v Herefordshire Council & Anr* [2016] EWCA Civ 1061: ‘In this context the concept of “preserving” the building or its setting means “doing no harm”’.

Section 9 Sources

Published Works

- Bradwell, Stephen. *Heritage Statement: Proposed First Floor Extension & Garage At No. 24, Kingston Road, Didsbury, Manchester*. Trigpoint Conservation & Planning Ltd.: October 2019.
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Appendix 1: Heritage Impact Assessment Methodology

The impact of the proposed works has been assessed using a cultural heritage impact assessment methodology based upon the ClfA/ IHBC/ IEMA guidance, *Principles of Cultural Heritage Impact Assessment in the UK* of July 2021, a methodology commonly used to assess heritage impact which is endorsed by several professional heritage organisations. Relevant paragraphs are extracted below.

Cultural Heritage Impact Assessment

1.4 Cultural Heritage Impact Assessment ('CHIA') is concerned with understanding the consequences of change to cultural significance. At a fundamental level, CHIA is used to make informed decisions about the sustainable management of cultural heritage assets.

1.7 This document provides guidance for cultural heritage practitioners in regard to the principles of CHIA. These are:

- A. understanding cultural heritage assets; and
- B. evaluating the consequences of change.

A. UNDERSTANDING CULTURAL HERITAGE ASSETS

A.2 The process of gaining this understanding is split into three stages:

- Description: Research and investigations leading to a factual statement that establishes the nature of the asset.
- Cultural significance: Analysis of what is valued about the asset, leading to a statement of cultural significance.
- Importance: A conclusion regarding the level of protection that the asset merits in planning policy and cultural heritage legislation.

Attributing importance

A.17 Importance is scaled (unlike cultural significance) and requires the competent practitioner to make a judgement regarding the merits of different cultural heritage assets. It is therefore appropriate to refer to 'high', 'medium' or 'low' importance or any other simple scale that offers a form of gradation.

B. EVALUATING THE CONSEQUENCES OF CHANGE

B.3 The process of evaluating the consequences of change falls into three stages:

- Understanding change: A factual statement of how a proposal would change a cultural heritage asset or its setting (including how it is experienced).
- Assessing impact: An assessment of the degree to which any change would impact cultural significance.
- Weighting the effect: A conclusion regarding whether an impact matters, reflecting the importance of the affected cultural heritage asset.

Assessing impact

B.7 An impact is a change in a cultural heritage asset or the experience of an asset in its setting that affects its cultural significance. This impact could be a positive or negative outcome. It is not a measure of the reach or extent of the proposal. Therefore, it is essential that the CHIA presents an understanding of how the proposed change relates to cultural significance and not the cultural heritage asset in its entirety.

B.9 The magnitude of the impact on cultural significance needs to be assessed. A distinction needs to be drawn as to whether the change will result in only a 'small' impact on, say, just one component of cultural significance or whether the change would have a greater impact on the totality of cultural

significance. The terms 'large', 'medium' or 'small' are acceptable or any other simple scale that offers a form of gradation easily articulated in a written report.

Weighting the effect

B.10 The effect is the measure that brings together the magnitude of the impact and the cultural heritage asset's importance. This is a critical stage of the assessment process as this determines the weight that should be given to the matter in either influencing the design of the proposal or, ultimately, in the test as to whether the proposal will be acceptable and permitted.

B.12 In relative terms, impacts on the cultural significance of assets of higher importance will be given greater weight than those of lower importance. For instance, a proposal that results in the total loss (i.e. the largest magnitude of adverse impact) of a cultural heritage asset of low importance would be an effect that should be given considerably less weight by the decisionmaker than the total loss of an asset of high importance.

B.13 A simple graded scale of effects should be defined and applied (as recommended for impact magnitude, above). However, decisions regarding the acceptability of a proposal will often require the effect to also be articulated within the parameters of the relevant legislative or policy tests that use their own specific language and terminology. For instance, in Environmental Impact Assessment ('EIA') an impact can result in significant or nonsignificant effects.