

Tonbridge and Malling Borough Council Heritage Impact Risk Assessments



FINAL

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Tonbridge and Malling Borough Council Heritage Impact Risk Assessments

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1.0 INTRODUCTION

1.1 Purpose of Report

- 1.1.1 As part of the Local Plan making process which sets out future development in the borough, Tonbridge and Malling Borough Council have commissioned CBA to undertake a series of high-level Heritage Impact Assessments (HIAs) of potential proposed site allocations for the Regulation 18 Local Plan submission.
- 1.1.2 The Regulation 18 Local Plan is drafted for consultation purposes and responses provided will inform the more detailed stage of plan making – Regulation 19 – which is the publication draft issued for Examination.
- 1.1.3 At this stage in the plan making process – Regulation 18 - the purpose of the assessments is categorising proposed sites in terms of likelihood of the *risk* of harm arising from development. They are not full heritage statements assessing levels of harm to heritage assets.
- 1.1.4 The assessments supporting the Regulation 18 submission identify and report on risk levels of harm to designated heritage assets, these being: scheduled monuments, listed buildings, registered parks and gardens and conservation areas. The assessments also consider risk to non-designated Historic Parks and Gardens.
- 1.1.5 The methodology for these initial high-level HIAs, as outlined in section 2, has been developed in line with national policy and best practice guidance to enable a robust and considered process of assessments across the sites.
- 1.1.6 These initial HIAs will form part of the evidence on which the Local Plan is based and, alongside other studies and relevant evidence, will feed into the allocation of housing, employment and mixed-use sites within the Local Plan.
- 1.1.7 Section 3 of the report provides a summary of the site assessments undertaken and highlights key findings. It draws from the detail of the tabular assessments undertaken, which are located at the Appendix at Section 5.
- 1.1.8 At Regulation 19 Local Plan submission, more detailed assessments will need to be undertaken on the potential proposed sites carried forward from the Regulation 18 submission, to include information such as impacts on locally listed buildings and non-designated assets recorded on the HER. The detail and methodology for these more detailed HIAs is outlined in Section 4 of this report.

2.0 METHODOLOGY

2.1 Scope of Work

2.1.1 Review of potential sites for allocation is based on T&MBC's supplied spreadsheet of Red and Amber sites. A total of 69 sites (14 Red sites and 55 Amber sites) have been analysed, with each site being considered in relation to nearby listed buildings, conservation areas and registered and non-designated parks and gardens. Sources consulted in this review included:

- National Heritage List for England
- The Kent Gardens Compendium, 1996
- Conservation Area Appraisals
- Google Maps and Street View
- MAGIC Map, DEFRA

2.2 Methodology for Assessment

2.2.1 The methodology takes into account the following policy and guidance:

- National Planning Policy Framework (NPPF)
- National Planning Policy Guidance (NPPG)
- Historic England's Good Practice Advice Note 1: The Historic Environment in Local Plans
- Historic England's Good Practice Advice Note 3: The Setting of Heritage Assets
- Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans

2.2.2 Shapefiles for the potential allocated sites, designated heritage assets and non-designated gardens were loaded into QGIS mapping software so that a spatial analysis could be undertaken for each site in conjunction with available data from Google Maps and Street View.

2.2.3 For each of the Red and Amber sites, three columns were added to the existing RAG assessment of the sites:

Description of Potential Impacts: Concise text setting out the nature of potential impacts of the significance of known heritage assets, due to changes in their fabric, character or setting.

Potential Mitigation Measures: Concise list of high-level potential measures that could be taken to significantly lessen or remove adverse impacts e.g. boundary changes/delineating areas for no development, landscaping buffers, building heights etc. These measures have not been presented graphically.

Risk of Harm Score: A simple score based on the assessment of potentially significant impacts and viability of mitigation for these impacts. The following definitions are used to describe the risk:

- **HIGH RISK** – Assets are present on site and in the vicinity, and further impact of any proposed development is required. Allocation has the potential to affect the significance of assessed heritage assets to a degree that results in significant conflict with national and local policy. The onus would be on the developer to ensure that proposals are developed that minimise/avoid harm.
- **MODERATE RISK** – Assets are present on site and in the vicinity, and further impact of any proposed development is required. Allocation has the potential to affect the significance of assessed heritage assets to a degree that results in some conflict with national and local policy. Impact may be wholly or partially addressed through design-based mitigation measures such as density and scale. The onus would be on the developer to ensure that proposals are developed that minimise/avoid harm.
- **LOW RISK** – No heritage assets on site or immediate vicinity. Allocation is unlikely to affect the significance of assessed heritage assets to a degree that results in notable conflict with national and local policy, and any impacts are likely to be wholly or partially addressed through design-based mitigation measures. Any proposals for development will need to identify and assess any significance and demonstrate any harm arising.

2.3 Limitations of Assessment

- 2.3.1 Site visits have not been undertaken in the compilation of these Assessments and potential visual impacts are therefore untested.

- 2.3.2 The HER has not been consulted and may contain information that has the potential to change the risk levels associated with each site.
- 2.3.3 Conservation Area Appraisals are not available for all CAs currently, where absent a rapid review of key features and characteristics, such as: key views, open spaces, plan form, enclosure, building heights, streetscape quality etc has been performed.

3.0 KEY FINDINGS AND RECOMMENDATIONS

3.1 Introduction

- 3.1.1 This section of the report summarises the information detailed in the tabular assessments, highlighting key findings such as the potential unsuitability of individual sites for allocation due to likely high risks of harm and the reasons for this. An overview of types of impact arising from allocations considered to generate moderate risks follows, with bulleted lists of the sites for which these impacts are a consideration.
- 3.1.2 This summary will be followed by a suite of recommendations for mitigating potential impacts. The recommendations are drawn from the specific advice identified for each site within the spreadsheet assessment.

3.2 Potentially unsuitable High Risk Sites

- 3.2.1 The tabular assessment identifies four sites where the risk of harm to heritage assets, at levels which conflict significantly with policy, is considered to be high. It is considered that, even with mitigation measures in place, the risk of harm would remain high, and consideration should be given to the removal of these sites from the allocation list. The reasons for the high risk of heritage harm are given below for each site. These reasons draw on the types of impact identified in more detail in section 3.3 below.

Land east of Chapel Street and east (rear of) 88 & 89 Chapel Street, Ryarsh (58668)

- 3.2.2 The proposed allocation site encloses the plot on which the Grade II listed Dingle Dell sits and the orientation and elevation of the property is such that it has a clear view over the site. The size of the site is small and visual impacts would be very difficult to mitigate with tree screening and buffers. Good quality architectural design could present a level of mitigation but the fact of development and the requirement for access and consequent encircling of the asset would remain. Alternative access could be proposed to the south of the site, but this would involve tree loss which would be deemed harmful to the character and appearance of the Ryarsh Conservation Area through loss of enclosure.

Land east of Town Hill, West Malling (59957)

- 3.2.3 This allocation covers an area called Banky Meadow and lies wholly within the West Malling Conservation Area. The area is recognised within the conservation area appraisal as part of an important open green space and immediately to its south is what is described within the appraisal as a key visual hinge. This is an area from which

multiple views allow the conservation area to be experienced within the wider setting of the South Downs. Whilst mitigation measures such as alignment of streets, plots and orientation of buildings could assist in the retention of views, and development edge set-back could assist in retaining a degree of open character, the essential openness of the site would be lost, harming the conservation area's character and appearance.

Land west of Addlestead Road, East Peckham, Tonbridge (59613)

- 3.2.4 The proposed allocation site lies between the conservation areas of Bullen Corner and Snoll Hatch, fronting onto Addlestone Road. The risk associated with this allocation is that its development will potentially lead to the coalescence of these two historically distinct areas, reducing their rural character and impacting negatively on the settings of the listed buildings located to the fringes of the conservation areas. Mitigation measures such as the set back of development from Addlestead Road, landscape buffers to filter the appearance of the development, such as tree screening, and careful consideration of access can reduce impacts, but residual harm is likely to remain at a level that conflicts significantly with local policy.

Land northeast of Bower Mount Oast, Snoll Hatch Road, East Peckham, Tonbridge (59837)

- 3.2.5 This allocation site lies adjacent to the Snoll Hatch Conservation Area and in the vicinity of several listed buildings. There is an existing buffer through the presence of two undeveloped field parcels, but filtered glimpses of development could be experienced in the context of the listed properties on Addlestead Road. The main issue in relation to this site is considered to be its cumulative impact with allocation 59613 as together they represent the encasement of the eastern flank of the Snoll Hatch Conservation Area.

3.3 Sites that generate Moderate Risk of harm

- 3.3.1 Fourteen of the assessed sites fall into the Moderate Risk category whereby their potential to generate harm to heritage assets, following mitigation measures, is likely to be reduced, but may still result in some levels of residual risk of harm.
- 3.3.2 The risk of harm generated by the allocations generally arises from the potential for the following impacts, with some allocations having the potential for multiple impacts. Not all of these impacts are present in all allocations and in each case there will be degrees to which these impacts are experienced.
- 3.3.3 Each impact type is followed by a bulleted list of the sites where this impact is likely to occur.

3.3.4 Impacts identified in this section may be addressed through design based mitigation measures. Recommendations for mitigation are given in section 3.4.

Urbanisation of context

3.3.5 This impact has a number of considerations attached to it in terms of generating potential harm, and many of these relate to the types of asset present in the environs of the allocation. For instance, farmsteads are sensitive to development in their rural context as it can impact on their historic functional value, particularly if the land concerned is, or was, in the ownership of the farmstead. Other assets sensitive to this potential impact are those located to the edge of settlements. The character of this situation, where settlement gives way to rural context, contributes to the settings and significance of assets found in these locations.

3.3.6 Sites potentially affected by this impact include:

- Land east of Aylesford Priory and south of High Street, Aylesford (58499)
- Land west of 115 High Street, Aylesford (59647)
- Land east of Bull Lane, North of High Street and west of Rochester Road, Aylesford (59676)
- Land north of Stocks Green Road, Hildenborough (59653)
- Land northwest of Maidstone Road and south of The Street, Mereworth (59750)
- Land west of Chapel Street, Ryarsh, West Malling (59744)
- Land north of Holborough Lakes, Snodland (68423)
- Land north of Borough Green, Seven Oaks (59830)
- Land south of London Road between Regent's Court and Park View, Wrotham Heath (58576)
- Land south of Snoll Hatch Road, West Peckham (59876)
- Land north of Walnut Cottage and east of Bullen Lane, East Peckham (68353)
- Land north of Church Lane, Hale Street, East Peckham (68418)
- Land west of Hale Street, East Peckham, Tonbridge (59782)
- Land south of Church Lane, Hale Street, East Peckham (68376)
- Land east of Maidstone Road, Hale Street, East Peckham (68462)

- Land south of Stocks Green Road, Hildenborough (59615)
- Land west of Church Street, Offham (68434)
- Land south of Potash Lane and north of Paddock Orchard, Platt (59617)
- Existing premises at Holmes Paddock, off (west of) The Street, Ryarsh (58665)
- Hilden Farm Road, Tonbridge (59745)
- Land south of Kemsing Road, Sevenoaks (68354)

Loss of open space

3.3.7 Linked to urbanisation is the potential for loss of open space in the context of the settings of assets or in terms of the character and appearance of conservation areas. The reduction of open space generally reduces the rural characteristic of conservation areas, although there may be instances where this is not the case. The loss of open space can also impact views associated with historic buildings or areas of landscape.

3.3.8 Sites potentially affected by this impact include:

- Land east of Aylesford Priory and south of High Street, Aylesford (58499)
- Land west of 115 High Street, Aylesford (59647)
- Land east of Bull Lane, North of High Street and west of Rochester Road, Aylesford (59676)
- Land north of Stocks Green Road, Hildenborough (59653)
- Land northwest of Maidstone Road and south of The Street, Mereworth (59750)
- Land west of Chapel Street, Ryarsh, West Malling (59744)
- Land north of Holborough Lakes, Snodland (68423)
- Land north of Borough Green, Seven Oaks (59830)
- Land south of London Road between Regent's Court and Park View, Wrotham Heath (58576)
- Land south of Snoll Hatch Road, West Peckham (59876)
- Land north of Walnut Cottage and east of Bullen Lane, East Peckham (68353)
- Land north of Church Lane, Hale Street, East Peckham (68418)
- Land west of Hale Street, East Peckham, Tonbridge (59782)

- Land south of Church Lane, Hale Street, East Peckham (68376)
- Land east of Maidstone Road, Hale Street, East Peckham (68462)
- Land south of Stocks Green Road, Hildenborough (59615)
- Land west of Church Street, Offham (68434)
- Land south of Potash Lane and north of Paddock Orchard, Platt (59617)
- Existing premises at Holmes Paddock, off (west of) The Street, Ryarsh (58665)
- Hilden Farm Road, Tonbridge (59745)
- Land south of Kemsing Road, Sevenoaks (68354)

Loss of trees/treed character

3.3.9 This aspect of development potentially associated with the allocations through the removal of trees can have adverse impacts on the character and appearance of conservation areas and listed buildings. This is most likely to occur where the treed character creates a sense of enclosure to a thoroughfare or group of buildings that is beneficial to the way it is experienced. If the buildings in question are listed or deemed to be positive within the conservation area, negative impacts arising from the loss of their context will be more harmful.

3.3.10 Sites potentially affected by this impact include:

- Land east of Bull Lane, north of High Street and west of Rochester Road, Aylesford (59676)
- Land between 10 and 74 Ryarsh Road and north of Ryarsh Road, Birling (58673)
- Land fronting Tonbridge Road, Hildenborough (68439)
- Land between Tonbridge Road and Stocks Green Road, Hildenborough (68432)
- Land west of 115 High Street Aylesford (59674)
- Land east of Aylesford Priory and south of High Street, Aylesford (58499)

Loss of hedgerows

3.3.11 The loss of hedgerows carries some of the same impacts as the loss of trees, as large hedgerows can create a considerable sense of enclosure in the context of rural roads within, and leading toward, conservation areas. Loss of hedgerows can also remove evidence of historic patterns of land management and this can be considered to be

harmful. The level of harm will be dependent on a number of factors, such as: the age of the hedgerow; the level of alteration to the landscape/field parcel boundaries already present and any historic connection to a listed building in its vicinity.

3.3.12 Sites potentially affected by this impact include:

- Land between 10 and 74 Ryarsh Road and north of Ryarsh Road, Birling (58673)
- Land fronting Tonbridge Road, Hildenborough (68439)
- Land between Tonbridge Road and Stocks Green Road, Hildenborough (68432)
- Land west of 115 High Street Aylesford (59674)
- Land east of Aylesford Priory and south of High Street, Aylesford (58499)

3.3.13 It is noted, however, that large allocations that span multiple field parcels may also cause impacts through removal of historic hedgerows.

Enclosure of assets

3.3.14 This potential harmful impact arises where a proposed allocation being fully built out would result in an asset being severed from its historical context by the surrounding presence of modern development. It relates to the impacts of urbanisation and loss of open space and may also involve severance of links between assets and loss of views.

3.3.15 Sites potentially affected by this impact include:

- Land at Broadwater Farm, Kings Hill, West Malling (59740)
- Land west of Hale Street, East Peckham, Tonbridge (59782)
- Land south of Church Lane, Hale Street, East Peckham, Tonbridge (68376)
- Land west of Church Road, Offham (68434)
- Existing premises at Holmes Paddock, of (west of) The Street, Ryarsh (58665)

Severance of historic links between assets

3.3.16 The severance of historic links between assets can take a variety of forms. The most immediately apparent is visual severance where assets that have been experienced as intervisible, co-visible or sequentially visible no longer continue to be so as a potential consequence of development. The degree of severance is likely to be more harmful if there is an associated functional link or historic ownership ties between the buildings. Associative and ownership links can exist between buildings that have no visual

connection, and the severing of these – even without visual severance – can generate levels of harm.

3.3.17 Sites potentially affected by this impact include:

- Land east of Maidstone Road, Hale Street, East Peckham (68462)
- Land south of Church Lane, Hale Street, East Peckham (68376)
- Land north of Holborough Lakes, Snodland (68423)
- Land at Broadwater Farm, Kings Hill West Malling (59740)
- Existing premises at Fosse Bank School, Noble Tree Road, Hidenborough (59679)

Competition for dominance

3.3.18 This impact relates to buildings such as churches, large country houses, civic buildings and other buildings where part of their significance is derived from their landmark status. Landmark status is largely, but not exclusively, a visual term and relates to the prominence and/or dominance of a historical feature within the townscape or landscape. Development at height within proposed allocations runs the potential risk of creating a visual challenge to the dominance/prominence of historic buildings within the built hierarchy of their environs. Development of significant height and/or volume can also sever visual links, as discussed above, and impact on important views.

3.3.19 Sites potentially affected by this impact include:

- Land east of Bull Lane, north of High Street and west of Rochester Road, Aylesford (59676)
- Land northwest of Maidstone Road and south of The Street, Mereworth (59750)
- Land North of Church Lane, Hale Street, East Peckham (68148)

Disruption/loss of key views

3.3.20 Whilst impacts to heritage are not exclusively related to visual matters, many harmful impacts do arise from incongruous development in the vicinity of heritage assets, particularly when identified views of the assets are negatively impacted. Impacts can arise from the loss of views by blocking the line of sight to the asset in question or from the intrusion of development within a backdrop or foreground to the view of an asset.

These impacts can be particularly harmful in the context of assets where historic designed views associated with a heritage asset are involved.

3.3.21 Sites potentially affected by this impact include:

- Land northwest of Maidstone Road and south of The Street, Mereworth (59750)
- Land north of Holborough Lakes, Snodland (68432)
- Land north of Borough Green, Sevenoaks (59830)

3.4 Recommendations

3.4.1 What follows is a suite of recommendations for potential mitigation of the issues identified within the assessment and outlined above. The recommendations are high level advice to avoid/minimise the nature of the impact and would need to be tailored to the specifics of each allocation site.

Urbanisation of context

3.4.2 This impact arises from an intensification of development on a previously undeveloped site, recommendations for the minimising of this effect include:

- Locating development to areas of the allocation site that are less sensitive
- Providing landscape buffers to protect the setting of assets – these can take the form of areas of open space or vegetative buffers (or both). The effective application of these will require an assessment of the existing landscape character.
- Careful consideration of built form in terms of typology, scale, massing, orientation, density, materiality and detailing.

Loss of open space

3.4.3 This impact may not be entirely mitigated, but the perception of openness within the site can be assisted by:

- Careful consideration of development orientation and grouping to maximise the use of garden plots/ areas of open space/recreation facilities to create openness whilst still employing the area in use.
- Establishing where views exist in relation to assets and maintaining these where possible.

Loss of trees/treed character

3.4.4 This impact is less common as a consequence of development than the loss of open space but will pertain to heavily vegetated sites where this contributes to assets' settings or the character and appearance of a conservation area. This impact can be mitigated by:

- Retaining a tree belt to thoroughfares where the sense of enclosure contributes to character/setting.
- Careful siting of access to limit the number of trees lost or to retain the treed sections to areas most sensitive in heritage terms.
- Careful orientation of development using tree planting within garden plots to generate the appearance of a treed environment in sensitive locations/views.

Loss of hedgerows

3.4.5 This impact potentially relates to most allocations but is particularly of issue in the agricultural context where hedgerows are likely to have historic illustrative value. This impact can be mitigated by:

- Research into the historic landscape patterns of the allocation site and identification of original/historic hedgerows and retaining these over those planted more recently.
- Limiting hedgerow loss by utilising existing access points between field parcels to guide the placement of road infrastructure.
- Strengthening degraded hedgerows with native species – this will also have ecology benefits.

Enclosure of assets

3.4.6 Avoidance or minimising of this impact can be achieved by:

- Ensuring that the asset retains a link, generally visual, to its wider surroundings.
- Identifying which area of the asset's setting contributes most in terms of its context and protecting this via a landscape buffer
- Protecting key views of the asset from the encroachment of development

Severance of historic links between assets

3.4.7 Links between assets that can be severed by development are often visual but may also be functional or associative. In most instances the severance of historic links has already taken

place, but in the case of agricultural land parcels this could see their severance from a listed farmhouse/Farmhouse complex. Mitigation for this impact includes:

- Protection of views between assets that have a functional relationship/historic functional relationship
- Retaining an appropriate landscape buffer in the context of farm buildings and their holdings

Competition for dominance

3.4.8 This is a particularly sensitive issue in relation to buildings where landmark status contributes to their heritage value but also has application in terms of architectural hierarchy in historic building groups. Mitigation measures to limit this impact include:

- Ensuring that development is subservient in scale and massing in the context of Landmark buildings and that views where this feature is experienced are preserved or, if appropriate, enhanced.
- Where development is in the context of a historic building group, consideration must be given to ensure that any evident hierarchy in building relationships is retained and not disturbed by building of inappropriate scale or mass.
- Careful analysis needs to be had of sites where the topography enhances visual relationships and avoidance of development on sensitive areas such as ridgelines may be required.

Disruption/loss of key views

3.4.9 Mitigation of this impact can take a number of forms, such as:

- Areas of no development to preserve views through an allocation site
- Restriction of height of development to preserve views of surrounding context
- Careful spacing and orientation of development to preserve existing views to assets/ wider landscape context

4.0 NEXT STEPS

4.1 Introduction

- 4.1.1 Following consultation under Regulation 18, the Local Planning Authority must publish their proposed Local Plan submission draft for public consultation under Regulation 19. To support this draft of the Local Plan, more detailed HIAs for the allocation sites proposed to be taken forward require preparation.
- 4.1.2 The aim of the HIAs is to provide a clear identification of the likely risks associated with any particular allocation site so that they can be reviewed in a focussed and transparent manner during the Local Plan process and appropriate policy developed.
- 4.1.3 The level of detail in any assessment and confidence in the risk of harm is directly proportional to the level of detail accompanying the site allocation. Where there is more information about the site in terms of known assets, understanding of significance and wider context and likely archaeological potential, then there can be more certainty about risks and better articulation of recommendations, potential for enhancements and ways of minimising or avoiding harm.

4.2 Methodology

- 4.2.1 The assessments would follow the following structure commensurate with the heritage considerations affecting the site and suggested recommendations. They would adopt the following process and structure:
- Step 1: Provide a baseline overview of the site and the proposed allocation.
 - Step 2: Identify designated heritage assets and non-designated assets in and around the allocation site, briefly describe their significance and describe the potential impact on their significance.
 - Step 3: Identify recommendations, constraints, possible mitigation and opportunities for enhancement where relevant.
 - Step 4: Score the likely risk of residual harm and prepare a short narrative statement summarising the outcome with supporting figures.
- 4.2.2 The above steps 1 – 3 are drawn from the methodology in Historic England’s Advice Note 3 – The Historic Environment and Site Allocations in Local Plans (2015). Step 2 above amalgamates steps 2 and 3 from the guidance, Step 3 above reflects Step 4 of the guidance, and Step 4 above provides summary analysis to inform the determination

(under Step 5 of the guidance) of the allocations' appropriateness in light of the NPPF's tests of soundness.

- 4.2.3 The following sections provide more detail on each step:

Step 1: Provide a baseline overview of the site and the proposed allocation.

- 4.2.4 Concise statements would be set out to describe the site's size, location, topography, and its current usage/occupation. The details of the proposed allocation would also be summarised including the proposed site use (housing / employment / mixed) where known.
- 4.2.5 The level of detail provided in this section would depend on the scale of the site (i.e. more information for larger sites) and the amount and depth of historic environment data/information available for the site and study area.
- 4.2.6 The aim of Step 1 would be to provide a baseline to be used later in the assessment to identify potential impacts that would be in clear conflict with national and local policy relating to the historic environment.

Step 2: Identify designated heritage assets, non-designated assets, and historic landscape character in and around the allocation site and describe the potential impact on their significance

- 4.2.7 Designated heritage assets and non-designated assets within a defined study area around each allocation site would be identified and mapped.
- 4.2.8 The significance and setting of heritage assets would be considered. Significance and setting are defined in the NPPF Glossary:

Significance: *The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.*

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

- 4.2.9 The scale of study area would likely be 1 kilometre for designated heritage assets and 250 metres for non-designated heritage assets¹, however, in some cases the sensitivity of heritage assets beyond these areas might also be assessed appropriate to their level of significance. In cases where assets beyond the study area are to be considered, this would be clearly stated in the assessment.
- 4.2.10 In cases where assets, both designated and non-designated, have group significance this would be set out and considered in the report. Similarly, where multiple assets of a similar nature and / or location exist, these would often be grouped to aid assessment. The assessment would identify additional site-specific key views which relate to the significance of heritage assets.
- 4.2.11 Site specific studies, such as archaeological desk-based assessment and fieldwork results, would also be reviewed to provide adequate information (in accordance with guidance in Historic England's Advice Note 3 – The Historic Environment and Site Allocations in Local Plans, 2015).
- 4.2.12 Brief statements about the significance of designated and non-designated assets would be outlined, particularly in terms of describing the contribution of setting to their significance and their designation, if any, where assets lie outside of the site itself.
- 4.2.13 Concise simple statements would be set out to describe the potential impact on the significance of identified assets / groups of assets (focussing on those affected). Standardised terms (no impact, low/moderate/high impact) would be applied to describe the potential scale of impact on assets based on available information. The level of detail would depend on the scale of the site and the level of detail available for the likely development of the site and historic environment data. The aim would be to identify where significant impacts might occur.

Step 3: Identify potential development constraints and opportunities for enhancement on the site

- 4.2.14 Based on the impact assessment carried out in Step 2, development constraints and enhancement opportunities would be considered for each site and where possible mitigation can be considered this would also be outlined.
- 4.2.15 Constraints could for example include areas of no development due to the presence of designated heritage assets, areas sensitive to the setting of designated heritage assets

¹ Following standard practice for the provision of Desk Based Assessments under ClfA guidelines

including key views, areas with known significant archaeology, areas of high archaeological potential, sensitive historic character or surviving historic landscape elements, key historic routes. The HIAs would also identify where additional works should be undertaken that might result in further understanding about heritage risks and future constraints.

- 4.2.16 Opportunities for enhancement would also be identified (where possible) e.g. tackling heritage at risk, enhancing legibility of historic features or assets, improved access across or to features, interpretation of heritage assets or features to improve understanding, or improved land management regimes.
- 4.2.17 Finally, requirements for further work would also be highlighted in order to provide more detailed information on likely impacts or remove a degree of uncertainty at the next stage of assessment or during the application / development management phase rather than Local Plan making.
- 4.2.18 All of the above would take the form of standardised statements. Where relevant, constraints and opportunities have been included in figures accompanying the individual HIAs.

Step 4: Score the likely risk of significant residual harm and prepare a short narrative statement summarising the outcome

- 4.2.19 Taking into account the recommendations from Step 3, the risk of harm arising from development of an allocation site for its proposed use would be identified in relation to potentially significant impacts on the historic environment. Here the historic environment refers to heritage assets. The following definitions would be used to describe that residual risk, following the application of recommendations:
- 4.2.20 **High Risk** – Allocation is likely to affect the historic environment to a degree that results in significant conflict with national and emerging local policy, and which is unlikely to be fully addressable through design-based mitigation measures.
- 4.2.21 **Moderate Risk** – Allocation is likely to affect the historic environment to a degree that results in some conflict with national and emerging local policy, but which may be wholly or partially addressed through design-based mitigation measures.
- 4.2.22 **Low Risk** - Allocation is unlikely to affect the historic environment to a degree that results in notable conflict with national and emerging local policy, and any impacts are likely to be wholly or partially addressed through design-based mitigation measures.

- 4.2.23 These categories essentially form a Red, Amber, Green (RAG) system of categorisation. Where sites are identified as Moderate or High Risk, further refinement of the site / proposals and further assessment may enable a change in risk category.

4.3 Data and information to be used in the assessment

- 4.3.1 The following sources of data and information would be used to inform the Heritage Impact Assessment in terms of identifying assets, analysing impact and identifying opportunities for enhancement, mitigation and setting parameters for future development (note: the sources below are not available/relevant for all sites):

- Listing and other designation data (Historic England)
- Heritage at Risk Register (Historic England)
- Historic Environment Record (HER) data from sites and study areas
- Historic Landscape Characterisation data
- Tonbridge and Malling Borough Council Local Plan evidence base and other planning documents (draft report and previous local plan policy for previous allocated strategic sites)⁶
- Conservation Area Appraisals or Character Statements
- Relevant supplementary planning documents
- Site Allocations background information (draft reports) and draft policy
- Site selection process evidence, background data, and draft policy requirements
- Previous planning application information
- Historic Ordnance Survey Plans
- Historic Landscape Characterisation reports
- Aerial Photographs maintained by Historic England
- LiDAR data
- Consultant site visits

- 4.3.2 Further information on designated heritage assets can be found on Historic England's national heritage list, and further publicly available information on non-designated

assets recorded within the Kent Historic Environment Record (HER) can be found on Heritage Gateway.

4.4 Managing Risks

- 4.4.1 Levels of risk to the historic environment that would be ascribed in these HIAs may change through the development management process as new information and more detailed assessment is undertaken that can both manage and reduce risk and / or identify new or greater sensitivities than were anticipated in earlier stages of assessment. Therefore, the risks set out within the HIAs would not be fixed and could be subject to change as proposals and assessments progress. Therefore, as a site moves through the development management process towards planning application stage, further assessment and design activities would enable greater confidence when reporting the level of impact to the historic environment than that which would be possible within the HIAs. However, the level of evidence used to develop the HIAs would be considered to be proportionate in plan making terms.

5.0 APPENDIX – TABULAR ASSESSMENT