



Neighbourhood Planning Information Sheet 4:

Site Allocations

1. Historic environment considerations need to be taken into account when seeking to develop specific sites in a neighbourhood plan.
2. The process of site allocation will entail identifying and assessing reasonable alternatives for site options, potentially using criteria to include or exclude sites and being clear about the reasons for selecting preferred sites.
3. Strategic Environmental Assessment (SEA) is a valuable tool in this decision-making process as it helps to assess the impact of development at different locations. Historic England's [advice note](#) on the Neighbourhood Planning and the Historic Environment includes more information on SEA.
4. Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal, taking into account an assessment of its significance; so, identifying and assessing significance is important.
5. Furthermore, great weight should be placed on the asset's conservation; the more important the asset, the greater the weight to the asset's conservation. Loss of, or substantial harm to, any designated heritage asset should be exceptional and wholly exceptional for assets of the highest significance.
6. However, it should also be noted that site allocations can present opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk through the sensitive development of specific sites.
7. More information on making the most of these opportunities, including using this route to tackle heritage is available in [The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3](#).



Newport Pagnell's Neighbourhood Plan allocated the former Aston Martin Motorcar Works site for housing development but also required the conservation and reuse of several historic factory buildings, including an unusual three-storey car factory building built in 1909 © Simon Peart, Milton Keynes Council

Gathering evidence to inform site allocations

8. The site allocation process is best informed by an up-to-date and robust historic environment evidence base as explained in section 2 of the Historic England [Advice Note](#) on neighbourhood planning and the historic environment. In many cases the evidence will already be available from a range of existing sources of information (see section 2.3). If additional evidence is needed, it is worth asking for support from the owner of the land promoting the site(s), as they may have access to more information or contribute funding toward any further assessments or investigations (such as archaeological fieldwork) that are required.

Archaeology and site allocations

9. An important aspect during site allocations is starting to think about archaeology. This is done with reference to the Historic Environment Record (HER) maintained by the local authority archaeological advisory service.

10. Where it has potential to affect the preservation of archaeological remains, i.e. through site allocation policies, a neighbourhood plan needs to show where the HER has been reviewed and how it has been taken into account in preparing a proposal.

11. Where no findings have been identified it is still necessary to consider whether other evidence, such as finds in the wider surrounding area or the form and history of development of a surrounding settlement suggests there may still be some potential for remains. Most sites within the historic core of a village or town, for example, will have some potential for the presence of medieval and later archaeological remains.

12. An archaeological statement would be used to demonstrate if there is a risk to the deliverability of proposed development due to the archaeology present. In contributing to the evidence for choosing one site above another, such assessment fits neatly within the SEA process as mentioned above.

13. It can be particularly useful to present archaeological data, such as HER records, on a map (rather than simply as a list of assets) as a map will allow more rapid appreciation of the distribution of assets and can help to identify any key foci of historic activity (which may also suggest where other unidentified assets are likely to be present) for consideration in relation to proposed site allocations.

14. For sites taken forward for inclusion in the neighbourhood plan, the archaeological statement would also inform any measures to reduce or avoid harm to archaeological remains (such as pre-application investigation) needed and these can inform planning policy.

15. National policy requires local planning authorities to identify and assess the significance of any heritage asset that may be affected by a proposal and take this into account when considering the impact of a proposal on a heritage asset. The greatest level of protection should be afforded to archaeological remains of national importance, the loss of which should be wholly exceptional. The preservation of archaeological remains can be delivered through careful layout of development proposals and use of public open space: see [Preserving Archaeological Remains](#) for more advice.

16. It is always advisable to seek guidance from local authority historic environment advisers (both archaeological and historic buildings conservation officer) on the scope and content of an archaeological statement.

Understanding the relationship between a potential site and relevant heritage assets

17. Historic England has been involved with many neighbourhood plans since their inception and in its experience the appropriate assessment of heritage assets to inform site allocations is likely to be the most challenging historic environment exercise for communities.

18. While the identification of relevant designated heritage assets within or near to sites being explored for allocation can be a relatively straightforward task, the setting of assets some distance away can also be affected by proposals. Initial scoping of assets therefore often needs to start some distance from the sites under investigation, and be underpinned by the need to understand the nature of any relationship which might exist between the asset and the site in question.
19. It is important to bear in mind that a lack of inter-visibility between site and asset (ie that each cannot be seen from the other) does not automatically mean that development of a site will not impact on an asset's setting. Equally, that a site is some distance from an asset also does not mean that its setting will not be affected.
20. As each asset has its own individual significance this means that the use of simplified or standardised criteria in site impact assessment is often unlikely to be appropriate. Uniformly asserting that any asset more than 50m from a site will not be affected, for example, is not in itself evidence based on an understanding of heritage significance.
21. Traffic light methodology which categorises potential for impact on a red, amber and green light basis also has difficulty in capturing and applying appropriate weight to the significance of individual assets which might be impacted upon.
22. Understanding the relationship between a potential site and relevant heritage assets will help to determine the suitability in principle of the site for development.
23. Once the principle is deemed acceptable, that understanding can then help in the preparation of a brief or development criteria in the allocation policy itself. This will help to inform, for example, development density, building heights, footprint and an overall quantum to ensure that development will not only be deliverable but will avoid harm to heritage assets.
24. Devising and applying appropriate methodology for gauging the potential and nature of impact on the setting of designated heritage impacts relies on informed judgement. In most cases a successful assessment is likely to be dependent on appropriate heritage expertise.