



West Oxfordshire District Council

Local Plan

Heritage Impact Assessments:
Methodology

September 2026



West Oxfordshire District Council
Local Plan
Heritage Impact Assessments

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A handwritten signature in black ink, appearing to be 'JB' or similar, representing Julia Bennett.

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Introduction

West Oxfordshire District Council has undertaken Heritage Impact Assessments (HIAs) of potential allocation sites as part of the Local Plan making process to guide future development in the Borough. The HIAs have assessed a series of potential development allocations. The HIAs will inform development of policy and recommendations for sites which are being considered for allocation within the Local Plan. This will enable the historic environment to play a positive role in how growth can be sensitively accommodated, to ensure the sites are deliverable and harm to heritage assets can be minimised or avoided.

A robust methodology was produced in consultation with the relevant officers within West Oxfordshire District Council. The HIAs consider heritage assets including historic buildings, buried archaeological remains, monuments, structures, parks and gardens (where they have a degree of heritage significance), historic landscape features. These can include both designated heritage assets¹ recognised at national level (i.e. Listed Buildings, Conservation Areas, World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens) and non-designated heritage assets²³ which have a degree of significance at a local level. Further definitions of these terms are set out in the National Planning Policy Framework Annex 2: Glossary⁴.

The methodology was developed in line with national policy and best practice guidance (see Policy and Guidance below) to enable a robust and consistent process of assessment across the sites where HIA is required. The HIAs are also underlined by legislation.

An additional bespoke methodology was developed for the assessment of impacts arising from the development of Area K on the Blenheim World Heritage Site. This methodology was developed in line with appropriate national and local policy and guidance, as well as guidance from UNESCO.

These HIAs will form a critical part of the evidence on which the Local Plan is based, and alongside other studies and relevant evidence, and will feed into the decision-making process and subsequently the allocation of housing and mixed-use sites within the Local Plan. These HIAs will also feed into the supporting Local Plan Policies for allocated sites.

Scope and Purpose

The purpose of the assessments is to:

¹ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary#:~:text=Designated%20heritage%20asset,the%20relevant%20legislation.>

² <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary#:~:text=relevant%20Marine%20Sites.,Heritage%20asset,-A%20building%2C%20monument>

³ <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

⁴ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- Identify sensitivities associated with known and potential heritage assets, including buried archaeological remains on the proposed sites and within suitable study areas surrounding sites;
- Describe potential impacts on heritage assets arising from proposed development of each site;
- Identify opportunities for enhancement or need for mitigation to minimise impacts;
- Where possible and relevant, identify high level parameters or constraints for development that can form part of a suite of future mitigation or design considerations; and
- Report, on an agreed scale, the risk of harm to the historic environment arising from allocating each of the individual sites.
- Undertake a bespoke assessment of the potential impact of developing Area K on the OUV of the Blenheim WHS, based on the above points.

Legislation, Policy and Guidance

The methodology takes into account the following legislation, policy, and guidance:

- Planning (Listed Buildings and Conservation Areas) Act 1990⁵
- Ancient Monuments and Archaeological Areas Act 1979⁶
- Historic Buildings and Ancient Monuments Act 1953⁷
- National Planning Policy Framework⁸
- National Planning Practise Guidance
- Historic England's Good Practice Advice Note 1: The Historic Environment in Local Plans⁹
- Historic England's Good Practice Advice Note 3: The Setting of Heritage Assets¹⁰
- Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans¹¹
- Historic England Advice Note 17: Planning and Archaeology¹²
- UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage
- UNESCO Operational Guidelines for the Implementation of the World Heritage Convention

⁵ <https://www.legislation.gov.uk/ukpga/1990/9/contents>

⁶ <https://www.legislation.gov.uk/ukpga/1979/46>

⁷ <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>

⁸ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁹ <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

¹⁰ <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

¹¹ <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

¹² <https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/heag314-planning-archaeology/>

As set out in NPPF para 199 ‘Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible’.

Per Historic England’s Good Practice Advice Note 1: The Historic Environment in Local Plans, the assessments are “proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets”.

The methodology used helps ensure that the risk of potential impacts can be identified during the local plan development process and corresponding weight given to them in decision-making when allocating sites for development.

Heritage Impact Assessments

Methodology and Risk Categorisation

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, influence decision-making and enable appropriate policy to be developed.

The level of detail in the HIAs and confidence in the risk of harm is directly proportionate to the level of detail accompanying a specific 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 the risks and better articulation of recommendations, potential for enhancements, and ways of minimising harm.

Proportional Approach

GPA 1¹³ (para 2) states that “all information requirements and assessment work in support of plan-making and heritage protection needs to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time, those taking decisions need sufficient information to understand the issues and formulate balanced policies.” In line with this guidance, a proportionate approach to assessment was undertaken, where sites with more complex heritage considerations were assessed in more detail, and sites which had very few heritage considerations were assessed in a more simplified manner. The assessment process is the same, but the content and level of detail therefore varied.

The level of assessment ranged from concise assessments for sites with minimal heritage considerations, to highly detailed assessments for sites with complex heritage considerations in line with the proportionate approach.

Complexity of heritage considerations was determined using following factors:

- presence of designate or non-designated heritage assets within the site
- strong relationships to designated heritage assets outside the site
- strong contribution to setting of designated heritage assets outside the site

¹³ <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

- potential for high value archaeological remains within the site
- potential for cumulative impacts as a result of nearby allocations
- requiring complex and detailed recommendations

HIA step process

The results of all assessments were reported in a structured format and were developed in line with guidance from Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans.

All assessments followed the same step process but differed in the amount of detail included commensurate with the number and complexity of heritage considerations affecting each site and suggested recommendations:

- 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 significant residual effect and prepare a short narrative statement summarising the outcome with supporting figures.

The following sections provide more detail on each Step.

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

Concise statements were set out to describe the site's size, location, topography, and its current usage/occupation. The details of the proposed allocation were also summarised including the proposed site use (housing / employment / mixed) where known.

The level of detail provided in this section depended 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.

The aim of Step 1 was 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

Designated heritage assets and non-designated assets within a defined study area around each allocation site were identified and mapped. The significance and setting of heritage assets were considered. Significance and setting are defined in the NPPF Glossary¹⁴:

“Significance: The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological,

¹⁴ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

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."

The scale of study area was 500 metres for designated heritage assets and 250 metres for non-designated heritage assets, however, in some cases the sensitivity of heritage assets beyond these areas was also assessed appropriate to their level of significance. In cases where assets beyond the study area were considered, this was clearly stated in the assessment.

Where assets have group significance this was set out and considered in the report. Similarly, where there were multiple non-designated assets of a similar nature and / or location, these were often grouped to aid assessment. The assessment identified additional site-specific key views which relate to the significance of heritage assets.

Site specific studies, such as archaeological desk-based assessment and fieldwork, were also reviewed to provide adequate information, particularly for large allocated strategic sites or those in potentially sensitive locations (in accordance with guidance in Historic England's Advice Note 3 – The Historic Environment and Site Allocations in Local Plans).

Brief statements about the significance of designated and non-designated assets were 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.

Concise simple statements were 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) were applied to describe the potential scale of impact on assets based on available information. The level of detail depended 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 was to identify where significant impacts may occur. Impacts could be both negative, in terms of whether proposals will harm the significance of heritage impacts as well as positive, such repair of designated heritage assets or conservation works.

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

Based on the impact assessment carried out in Step 2, development constraints and enhancement opportunities were considered for each site and where possible mitigation could be considered this was outlined.

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

Opportunities for enhancement were also 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.

Finally, requirements for further work were also 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. All of the above takes 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 effects and prepare a short narrative statement summarising the outcome.

Taking into account the recommendations from Step 3, the risk of harm arising from development of an allocation site for its proposed use is identified in relation to potentially significant impacts on the historic environment. Here the historic environment refers to heritage assets. The following definitions are used to describe that residual risk, following the application of recommendations:

- **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.
- **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.
- **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.

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. In addition to scoring the level of risk, recommendations are outlined which could be included in specific policies summarising the findings in terms of mitigation which could be employed on the site, constraints and opportunities.

Cumulative Impacts

Cumulative impacts have been considered in line with EIA Regulations 2017 which states a need to consider “the characteristics of development with particular regard

to...cumulative with other existing development and / or approved development". Cumulative impacts can arise as a result of intra-project (impacts arising from one project) and inter-project (impacts arising from one project interacting with other projects in the vicinity). These assessments therefore consider a quantum or scoring of harm and then consider whether the addition of further projects would combine to create the same, lesser or greater category of harm to an asset or assets (Cumulative impacts).

Data and information to be used in the assessment

The following sources of data and information were 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 for all sites):

- Listing and other designation data (Historic England)
- Heritage at Risk Register (Historic England)
- Application material and associated statutory consultee commentary which has been provided for sites (and potentially nearby sites where cumulative impacts are considered a risk)
- Historic Environment Record (HER) data from sites and study areas
- Oxfordshire Gardens Trust data¹⁵
- High level commentary on the sites from the Oxfordshire County Archaeologist
- Historic Landscape Characterisation data¹⁶
- West Oxfordshire District Council Local Plan evidence base and other planning documents (draft report and previous local plan policy for previous allocated strategic sites)
- West Oxfordshire District Council Design Guidance¹⁷
- Conservation Area Appraisals or Character Statements
- Draft Local Heritage List
- Relevant supplementary planning documents
- Site Allocations background information (draft reports), relevant planning application material and draft policy
- Previous planning application information
- Historic Ordnance Survey Plans
- Historic Landscape Characterisation reports
- Historic and current aerial photographs maintained by e.g. Historic England, Google Earth
- Consultant site visits

For Area K specific assessment (see methodology below), the following sources of information were also reviewed and used to formulate the assessment

¹⁵ <https://ogt.org.uk/west-oxfordshire-gardens/>

¹⁶ https://archaeologydataservice.ac.uk/archives/view/oxfordshire_hlc_2017/downloads.cfm?database=yes

¹⁷ <https://www.westoxon.gov.uk/planning-and-building/planning-policy/supplementary-planning-documents/>

- World Heritage Site specific information including the Blenheim Palace WHS Management Plan, Inscription information and Statements of Outstanding Universal Value,
- ICOMOS Technical Review for Blenheim Palace documentation (2024) and Historic England letter regarding the ICOMOS Technical Review highlighting risk of cumulative impacts
- Planning application material for existing and proposed Local Plan Allocations within West Oxford (and neighbouring authorities where there is a risk of cumulative impact highlighted by Historic England) including pertinent baseline information or analysis e.g. ZTVs or photographs and statutory consultee commentary

Further information on designated and non-designated heritage assets can be found on Historic England's national heritage list¹⁸, and within the Oxfordshire Historic Environment Record can be found on the Oxfordshire County Council website¹⁹.

Area K Assessment

Area K, or "Land South-west of Hanborough" is located less than 500 metres from the Blenheim World Heritage Site (WHS). There is potential for impacts on the Outstanding Universal Value of the WHS as a result of developing Area K, as such, a bespoke HIA is required to assess the risk of impact and recommend appropriate mitigation. This is in addition to assessing the potential for impacts on other designated and non-designated heritage assets.

A detailed assessment cannot be undertaken, as development designs have not been finalised, however, principles of development can be assessed at high level and recommendations can be made about areas of high sensitivity, levels of risk of conflict with Policy and potential mitigation measures which may lessen this risk.

Methodology

The bespoke assessment follows the same step process detailed above in order to identify non-WHS heritage assets and archaeology and potential risks of impact, taking into account the high level development proposals for the site. Mitigation is recommended to manage identified risks.

There is an additional section within this assessment to discuss the WHS and potential impacts on its OUV. This section:

- Considers key views, non-visual aspects of setting and how the site may contribute to attributes of OUV and historic setting.
- Assesses potential direct and indirect impacts on attributes of OUV, taking into account the high level development proposals.
- Assesses potential for cumulative impacts, considering nearby existing Local Plan allocations, live applications, or forthcoming potential allocations in the draft Local Plan, and in the neighbouring Cherwell draft Local Plan (e.g. KID H1)

¹⁸ <https://historicengland.org.uk/listing/the-list/>

¹⁹ https://heritagesearch.oxfordshire.gov.uk/search/all:gisItems/0_50/all/score_desc/*

- Identifies potential mitigation measures or enhancement opportunities
- Scores the risk of conflict with Policy.

This assessment is supported by figures illustrating the above elements.

This assessment, alongside the other Heritage Impact Assessments, is structured to withstand examination and potential scrutiny by Historic England and other stakeholders as necessary, and was conducted in alignment with appropriate guidance from UNESCO and ICOMOS.

Managing Risks

Levels of risk to the historic environment 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 was anticipated in earlier stages of assessment. Therefore, the risks set out within the HIAs are not 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 will enable greater confidence when reporting the level of impact to the historic environment than is currently possible within the HIAs. However, the level of evidence used to develop the HIAs is considered to be proportionate in plan making terms.

Risks, and potential harm could be lowered or avoided through mitigation measures. Mitigation measures could be implemented at outline or detailed design stage or at post-consent stage through conditions applied within a planning consent. Risks, and potential harms may also be increased or newly identified through more detailed assessment. This could include for example, undertaking archaeological fieldwork and identifying important archaeological remains on a site. When risks are elevated, the measures described above should be considered to minimise or avoid harms where possible.

It must be noted that undertaking archaeological fieldwork may not always result in sufficient mitigation to enable development. The findings of archaeological fieldwork may be significant and as such preclude future development at a site, or the cost of undertaking appropriate levels of archaeological fieldwork may have financial implications for the viability of development.

As discussed in the methodology section, these HIAs have identified constraints on development based on risks to heritage assets. Additionally, these HIAs have identified any opportunities that development could offer to enhance the setting or significance of heritage assets.

It is anticipated that the identified constraints and opportunities could lead to development design considerations that might include areas for avoidance, screening or planting, limitations on density or heights of development, geographic spread or arrangement of built form, retention of heritage assets or sensitive historic elements, enhancing legibility of historic features or assets, and improved access given the known geography and likely boundaries of a site.

As such, the residual risk scores in these HIAs assume that there will be a level of mitigation put in place as part of any considered design for a site, taking account the identified constraints and suggested opportunities.



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