The potential indirect impact on cultural heritage has become a contentious issue in environmental impact assessment over recent years. Initially the approach to assessing such impact was largely undefined but over the past decade two main methodologies have been developed: one that adapted the DETR’s guidance for Multi-Modal Study (perpetuated by English Heritage’s 2011 guidance Seeing the History in the View) in using a tabulated matrix that considered the sensitivity (heritage significance) of the receptor (heritage asset) against the magnitude of change so that the significance of effect could be determined; and the second which used a narrative approach to describe the asset and its significance, with professional opinion based on the assessor’s knowledge and experience, to determine the degree of indirect impact from changes to the setting of a heritage asset, that would result from the proposed development.

The first approach has the veneer of objectivity and is preferred by clients and legal reviewers because it appears similar to other assessments and is easy to summarize. The second appears more subjective and takes a more in depth study to comprehend what is of importance.

The first approach, however, suffers from a small number of descriptions which are too coarse for the kind of detailed assessment that is often necessary (i.e. High, Medium or Low for sensitivity/value, High, Medium or Low for magnitude of change, and Major, Moderate, Minor and Negligible for significance of impact/effect). For example, when applied to a listed building of obvious national importance (High sensitivity), this tabulated approach makes any small degree of change (low adverse impact) result in a “Moderate” significance of effect. In reality the effect is probably far less than the table allows, especially when it is the setting rather than the asset itself that is being assessed.

With the introduction of various guidance documents and new planning policies the clarity of how to assess significance of the heritage asset, and how its setting might contribute to appreciation of that significance, has been greatly improved. The tools to articulate a logical assessment are available, with terminology and key parameters defined. This does not, however, lessen the intellectual process, and in fact analysis of these elements is perhaps made more complex by the raft of guidance now available. Simplistic examples provided by the guidance are far removed from the actual pitfalls and complexities of real life situations where an apparent impact has to be weighed against what is of significance for appreciating the heritage asset.
PPS5 and The Settings of Heritage Assets provide a glossary of terms used, and suggest a processual approach to assessment. Although the recent National Planning Policy Framework has replaced PPS5, much of its key content has been retained in the new framework. Crucially though, the terms that are used to suggest a development might have an impact on the settings of heritage assets are “substantial harm” and “less than substantial harm”. These phrases are not defined anywhere, and in fact restrict all assessment to an extremely coarse measurement of “substantial” or “less than substantial”.

Thus a flue stack from an energy from waste facility located 1km from a heritage asset might be described as “substantial harm” by national agencies and local authorities objecting to an application, without reference to the fact that construction of that same plant in close proximity, or within adjacent fields approximately 500m away would be more substantial. The fact that 95% of the viewshed from the heritage asset might be unaffected is ignored, whilst the objection for “substantial” harm appears to hinge on any visibility that the development might have from the heritage asset.

This is of course, nonsense, and not what the policy and guidance actually says. Proportionality is all important, and a thorough analysis of what constitutes the setting of the heritage asset, what in that setting is of importance to appreciate the significance of the asset, and to what degree changes have already affected appreciation of the asset within its setting, must be undertaken in order to detail the degree of change that the proposed development would make to the setting, and thus its potential harm.

Many inspector’s decisions have demonstrated what seems to be an acceptable approach, including for example Rookery South RRF, Fewcott wind-farm, Battlefield Waste to Energy plant, Catshead Woods wind-farm, Ardley Energy from Waste. A simple equation of intervisibility between the proposed development and the heritage asset, which is often the criterion used by objectors, is not sufficient to assess the impact on cultural heritage.