
Statement Heritage

102 Truro Road, St Austell

Heritage Impact Assessment: PA21/09370

6/10/2021



Non Technical Summary

The proposal to develop two traditionally detailed detached dwellings to the rear of 102 Truro Road, St Austell, PL25 5HH takes place within the Suburban and Residential character area of the St Austell Conservation Area.

This assessment evidences the development and condition of the historic character of the development site and its immediate setting - showing that the development would preserve the principal contributions that 102 Truro Road make to the Conservation Area, introducing only minor less than substantial harm to a minor and already altered part of the character area.

The assessment takes into consideration positive mitigation by design included within the development, including the traditional form and massing of the proposed development, which is considered to be complimentary to the existing character of this part of the Conservation Area.

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1. Introduction and Methods

- 1.1 This report has been written to assess the impacts of a proposal to develop a single dwelling to the rear of 102 Truro Road, St Austell, PL25 5HH).
- 1.2 The report responds to requirements in the NPPF (P128) (DCLG 2012) and Cornwall Local Plan (Policy 24) (CC 2016) to ensure that all applications for development are based on a proportionate assessment of the significance of any heritage assets affected, including any contribution made by their setting.
- 1.3 Desk based research and analysis has involved:
- Consultation of the Cornwall and Scilly Historic Environment Record to identify designated and undesignated sites;
 - Consultation of the St Austell Conservation Area Appraisal and Management Plan (2017) and Cornwall and Scilly Urban Survey (2002)
 - Historic map regression
- 1.4 A site visit was made on 5/10/21 in wet, rainy conditions. This involved:
- Photographic recording of the site and its setting
 - Visual assessment of the character and appearance of this part of the Conservation Area
- 1.5 The assessment methodology follows the recommended processes set out in Historic England's Good Practice Advice Notes in Planning 2 (Decision Making in the Historic Environment) and 3 (The Setting of Heritage Assets).

1.6 Recent case law has developed a principle that ‘less than substantial harm’ (the threshold identified by NPPF P134) does not necessarily amount to a less than substantial objection to the grant of planning permission (Barnwell Judgement [2014] EWCA Civ 137 p29). In such cases it is incumbent on decision makers to ensure an informed balancing exercise is carried out, taking account of the public benefits of the proposal, the degree of harm and the statutory and policy weight to be accorded to designated assets. Assessing the degree of harm to a heritage asset typically involves a balance between different heritage values and a degree of professional judgement is always involved. To ensure that the judgements given in this report are as clear as possible the assessment uses the following definitions to develop a four-step grading of harm.

Substantial Harm	The heritage values of the asset or its setting are so degraded as to remove the value for which it was designated / identified as a heritage asset
Moderate Less than Substantial Harm	A major element of the heritage value of the asset or its setting is lost, whilst enough value is retained to continue to justify identification as a heritage asset
Minor Less than Substantial Harm	Some heritage values are harmed but these do not constitute a major element of the significance or its asset, and/or the change is offset by enhancement or revelation of other heritage values
Negligible Less than Substantial Harm	Minor negative harm to the heritage values of a place that are neither substantive or primary to its overall significance

2. Summary of Relevant Policy and Guidance used in this assessment.

- 2.1 The National Planning Policy Framework (2012) states that the “[conservation of] heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations” is a core principle of the planning system”.
- 2.2 Specific policy for heritage assets are set out in Chapter 12 of the NPPF.
- 2.3 The NPPF’s approach requires assessment of the significance of heritage assets and the contribution of their setting (NPPF P128).
- 2.4 ‘Significance’ is defined in the NPPF as “*The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.*”
- 2.5 ‘Setting’ is defined in the Framework as “*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*”. Paragraph 13 of the NPPF Planning Practice Guidance ‘Conserving and Enhancing the Historic Environment’ states the following;

“A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation."

- 2.6 The LPA should take any assessment of the significance of assets and their settings into account in considering the impact of proposals (NPPF P129).
- 2.7 The LPA should give "great weight" to the conservation of the significance of designated heritage assets and their settings. The more important the asset the greater the weight should be. *"As heritage assets are irreplaceable any harm or loss should require clear and convincing justification."* (NPPF P132)
- 2.8 The NPPF describes two levels of importance according to designated heritage assets. *"scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites"* are described as *"of the highest significance"*. 'Substantial harm' to such assets is described as 'wholly exceptional'. P139 extends the same test to non-designated archaeological sites of equivalent significance to Scheduled Monuments. *"Substantial harm to or loss of a grade II listed building, park or garden should be exceptional"*.
- 2.9 'Substantial harm' is not defined within the NPPF. The NPPF Planning Practice Guidance states the following; *"Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."*

2.10 P 134 of the NPPF states that *“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 securing its optimum viable use.”*

2.11 The NPPF also gives planning weight to non-designated heritage assets. These can include assets identified by local lists or on Historic Environment Records. P135 of the Frameworks states *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

2.12 P137 of the NPPF states *“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 or better reveal the significance of the asset should be treated favourably.”*

138. Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

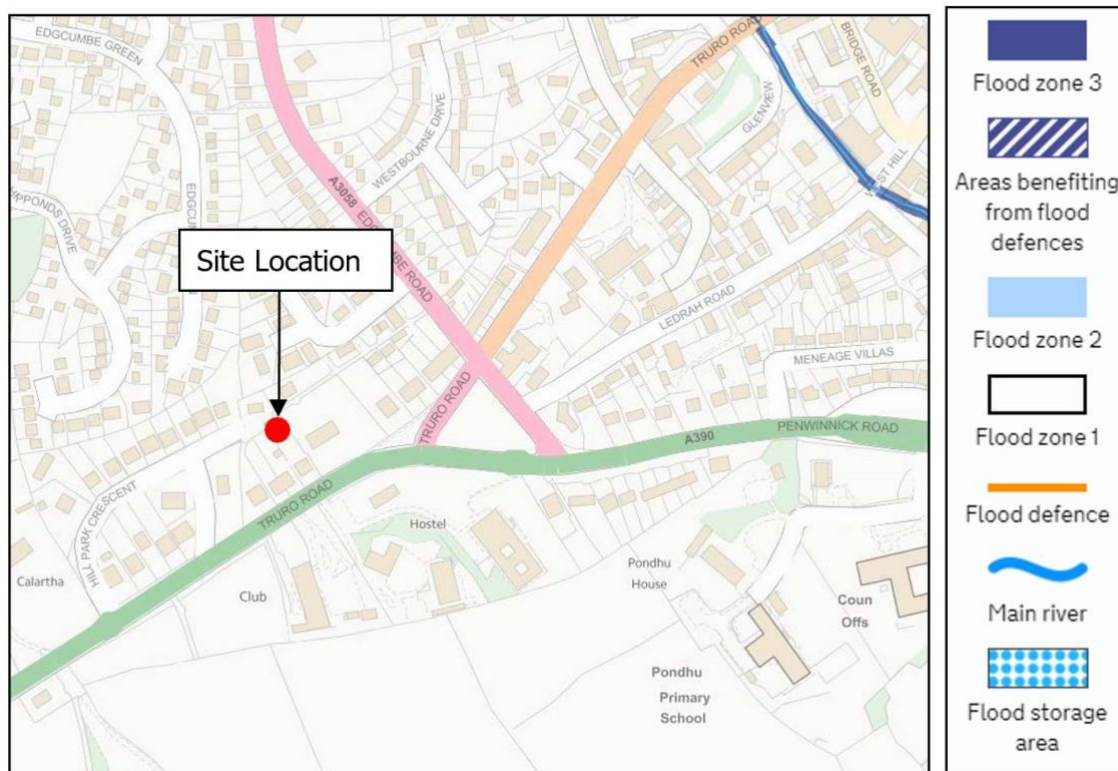
2.13 The Cornwall Local Plan also places considerable planning weight on the conservation of the historic environment and of local character and distinctiveness. Policy 24 carries over the essential principles of NPPF Policy 24 and takes a positive approach to proposals which *“sustain the cultural distinctiveness and significance of Cornwall’s historic rural, urban and coastal environment by protecting, conserving and where appropriate enhancing the significance of designated and non-designated assets and their settings.”*

3.Site Location. Description and Brief Historic Background of Study Area.

Nb - Text relating to the photographic survey undertaken (Appendix 1) are indicated as in red text within square brackets.

3.1 Number 102 Truro Road proposed site are located at the back of the property junction of Truro Road and Edgcombe Road.

Figure 1. Site Location Plan



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- 3.2 Truro Road dates to the 1830s (Cornwall Council 2002), built to replace the historic western approach (which followed Ledrah Road before crossing the St Austell River across the GII Listed 16th century ‘Old Bridge’ NHLE1212078; CHSERMCO9712) by taking a higher route into the town. Nos 102 dates between the 1882 and 1907 OS surveys.
- 3.3 No 102 form the eastern end of a detached house. The the property is typical of the larger detached housing built in St Austell towards the end of the 19th century. The houses are of ashlar granite with probable Delabole slate roofs¹, the Truro Road frontage featuring projecting gabled wings to the end houses either side of a pair of large dormers.
- 3.4 The house has a front garden and a large back garden with double garage on the site.
- 3.5 To the rear of the garden a service lane provides access to the property along Truro Road, via a access lane to existing parking and garage. including those later properties built in the 1900s within the access lane which are mainly new builds with a rendered exterior. Some boundary garden walls remaining from the original build are un-coursed granite rubble of construction. A modern concrete garage lies to the immediate rear of the garden of number 90.
- 3.6 The garden of 102 Truro Road are currently boundary by a granite wall which follows the whole plot.
- 3.7 Within the Conservation Area the ‘setting’ of the detached property includes a similar, slightly older group of newer buildings, residential and garages. The open triangular greenspace between Truro, Edgecombe and Penwinnick Roads on which stands a listed milestone contemporary with the construction of Truro Road [014]. Along the rear service lane numbers 1, 3 and 5 Edgecombe Rd are contemporary with nos 88 and 90 – probably originating as coach houses for the Truro Road houses. This area has seen similar recent development to that currently proposed. No’s 102, 5a and 5b and their garages date from 2004-5 and were developed, in part, within plots created from the subdivision of the gardens of no’s 94 and 96 Truro Road.

4. Assessment of Significance and Impacts

- 4.1 St Austell Conservation Area was first designated in 1967 around the Church and its immediate surroundings, being extended along Fore Street in 1976. The wider town was assessed in 2003 as part of the Cornwall and Scilly Urban Survey (CAU 2003). The CSUS study described Truro Road as being within the ‘suburban residential’ character zone – a group of areas of broadly mid to late 19th century date, built

on what was then the settlement edge on the middle to upper slopes around the historic town core. Houses within the character area are generally larger than those within the historic core and provided with generous garden plots. This evidence base informed the Council's appraisal and enlargement of the Conservation Area in 2013, which has recently been revised (Cornwall Council 2017). The current Management Plan continues to define a 'Suburban Residential Character Area'.

- 4.2 The front elevation of 102 Truro Road makes a positive contribution to the character and appearance of the Suburban Residential Character Area, although it represents a later and slightly higher density of development than the detached properties that represent much of the Character Area, for instance those to the south of Truro Road. The mature trees to the rear of number 88 and the stone posted gateway into its rear garden are typical of the character area and make a positive contribution.
- 4.3 The character of the service lane was already, by the time of its inclusion within the Conservation Area, of mixed date as a result of the development of numbers 5a and 5b Edgcumbe Road in the '00s. This modified mixed character is demonstrated by figure 3. Development would also involve the rebuilding (in matching form and materials) of the existing outer boundary walls (to create an improved visibility splay between the rear lane and Edgcombe Road).



5 Conclusion

- 5.1 P138 of the NPPF deals with the loss of positive elements of a Conservation Area stating that such cases “should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole”.
- 5.2 In the case of this development the elements of 102 Truro Road making the strongest contribution to the Conservation Area are the mature trees to the south east of the garden of no 100. These elements are excluded from the current scheme and would be conserved in their current state.
- 5.3 Building of this property should replicate its surrounding new builds to not mitigate any harm to the rear service lane to the Conservation Area is reduced by the already altered character of this area, and by a concrete garage to the rear of no 90 and 102.
- 5.4 The reduction in the existing gardens of 102 Truro Road and the alterations in the character of the rear service lane have the potential to cause no more than minor less than substantial harm. Our assessment of this degree of harm takes into account our assessment of the existing mixed character of the rear service lane, and the mitigation by design of the proposed unit which can be predicted to continue this modified character by introducing a further traditionally detailed unit o existing new builds.

6. Sources

Historic Mapping Sources Consulted

Ordnance Survey Cornwall (25 inch to the mile) 1882

Ordnance Survey Cornwall (25 inch to the mile) 1907

Survey Data Consulted

Google Maps (Aerial Photography) 2017

Ordnance Survey MasterMap 2017 (1:1250 and 1:10,000 + ‘OpenData’ derived products)

Cornwall and Scilly Historic Environment Record 2017 (Monuments layer) – OGC licenced WFS data

downloaded via Inspire web portal Oct 2017

National Heritage List For England - Statutory designation data downloaded from www.historic-england.org
Oct 2017

Bibliography

Cornwall Archaeological Unit 2002 St Austell: Cornwall and Scilly Urban Survey.

Cornwall Council 2016 Cornwall Local Plan Strategic Policies

Cornwall Council 2017 St Austell Conservation Area Appraisal and Management Plan

DCLG 2012 National Planning Policy Framework

Historic England 2015 Managing Significance in Decision Taking in the Historic Environment

Historic England 2015 The Setting of Heritage Assets GPAN 3

Historic England 2016 Historic England Understanding Historic Buildings





