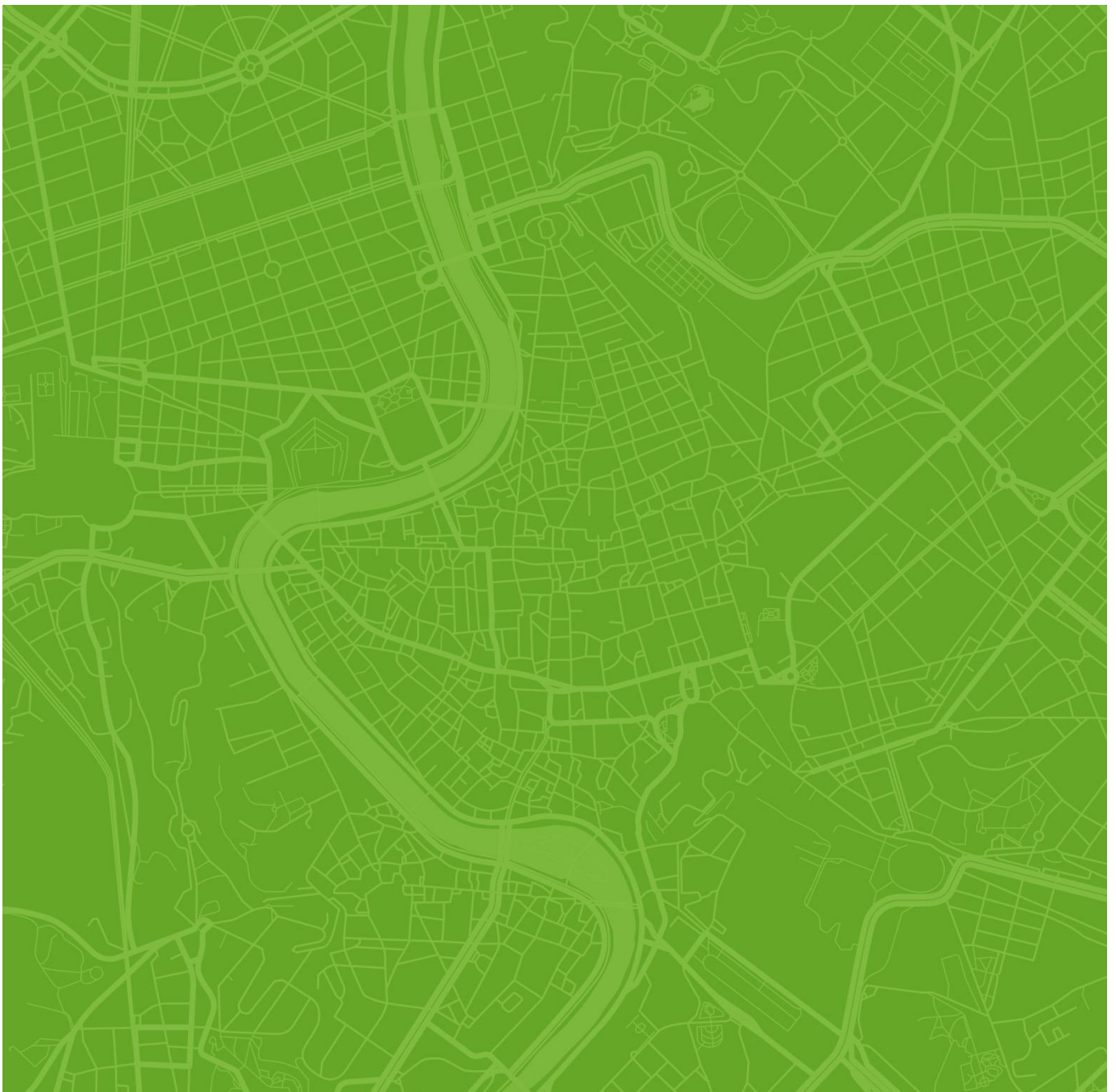


Tower Hamlets Council

Leaside AAP IIA **Heritage Impact** **Assessment Stage 1**

Final report
Prepared by LUC
March 2021



Tower Hamlets Council

Leaside AAP IIA
Heritage Impact Assessment Stage 1

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Chapter 1

Methodology

Background and purpose

1.1 LUC was commissioned to carry out Integrated Impact Assessment (IIA) of Tower Hamlets Council's emerging Leaside Area Action Plan (AAP). Part of this process involved assessing the risks to the historic environment from development of site allocations in the AAP area.

1.2 Stage 1 consisted of strategic appraisal, flagging the risks of significant effects to the historic environment. Sites identified to have likelihood of significant effects are recommended for full Heritage Impact Assessment at Stage 2.

Approach

1.3 The approach to the study has been established in line with recognised practice, as set out in the Chartered Institute for Archaeologists (CIfA) Standard and Guidance for desk-based assessment, noting that this is a strategic study, looking at proposed sites with no scheme details, whereas the standard is targeted towards project-specific assessment.

1.4 In addition, guidance published by Historic England on *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (GPA3)* has been followed to understand the contribution of setting to the significance of assets and impacts thereon. Similarly, *The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3 (HEAN3)* has informed the methodology.

Stage 1: strategic appraisal

Task 1: data gathering

1.5 Baseline data was provided by the client to LUC, including:

- Modern Ordnance Survey (OS) base mapping;
- GIS data for the proposed land allocations and alternatives;
- GIS data for relevant local historic environment designations - conservation areas, locally-listed buildings (LLB), archaeological priority areas (APA), London Squares, World Heritage Sites and buffer zones;
- Historic Environment Record (HER) data sourced from Greater London Archaeological Advisory Service

(GLAAS) for the proposed land allocations and alternatives, covering the sites and a 500m buffer;¹

- Relevant supporting documents (e.g. links to conservation area appraisals);

1.6 LUC sourced:

- Historic England (HE) designated heritage asset and heritage at risk data.
- Recent digital aerial photos, publicly available LiDAR data and Google ‘Streetview’ imagery.

1.7 On receipt of relevant data, the project team reviewed the supplied datasets to determine confidence levels in terms of accuracy and onward utility. Our GIS and Visualisation (G&V) team collected, verified and collated the relevant spatial data, including Ordnance Survey mapping and other data provided by the client, into ArcGIS to facilitate baseline analysis and scoping of preliminary work.

Task 2: desk-based assessment

1.8 Using GIS datasets as the starting point, each proposed allocation site and reasonable alternative was examined in turn, identifying:

- Known heritage assets with potential to experience effects as a consequence of development;
- The significance of those assets, including the contribution of setting;
- The sensitivity of that significance to change as a consequence of development:
 - Physical change, for assets within potential development boundaries; and
 - Setting change for assets outside potential development boundaries.
- Potential level / risk of harm to significance as a consequence of development on site.

1.9 The outputs of this process were recorded in tabular form, dealing with potential effects on designated and non-designated assets separately and then providing an overall judgement on the risk of harm, using the same framework as the IIA, as illustrated in Figure 1.1 below.

Figure 1.1: Scoring framework/ Key to symbols and colour coding

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/- or ++/--	Mixed minor or significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

1.10 At this high-level stage of the scoping assessment the assets' status of designation was used as the principal indicator of relative significance, adjusted where necessary using professional judgement for previously unidentified assets that appear to be of demonstrably high, medium or low significance.

1.11 The status of designation was not, however, used to assess risk of harm or potential effects because the significance of a heritage asset is not the same as its sensitivity to change. The significance of a heritage asset remains constant no matter what the proposal, but its sensitivity to change can fluctuate depending on what values underpin the asset's significance and the specifics of the proposed change; accordingly, the grade of a designated asset is not an analysis of how sensitive it is to change, it is just a guide to how significant it is. With this in mind, it is not appropriate to apply a blanket risk rating based on grade to all heritage assets in the study area. Instead, the assessment necessarily considers what is significant about each asset individually, what their setting contributes to that significance, and how that significance would be affected by a proposal for change within its setting. By approaching it in this way, a more nuanced assessment of sensitivity relating specifically to individual significance can be established.

¹ GLHER Report 16121 Tower Hamlets, 09/03/2021

1.12 Figure 1.2 sets out the definition of each level and how the status of designated and non-designated heritage assets was assigned to those levels accordingly.

Figure 1.2: Levels of significance and their definitions

Value	Criteria
High	Designated heritage assets of national or international significance: world heritage sites, scheduled monuments, listed buildings, registered parks and gardens, registered battlefields and protected wrecks. May be: conservation areas of demonstrably national / international significance (usually found in conjunction with one of more of the above mentioned asset types). Non-designated heritage assets that meet the criteria for statutory designation or are of equivalent significance.
Medium	Conservation areas and non-designated heritage assets of regional significance. May be: locally listed buildings or locally listed parks and gardens, sites of archaeological interest as noted on the HER, previously unidentified non-designated assets of demonstrably regional significance.
Low	Non-designated heritage assets of local significance. May be: key features in a conservation area, buildings / areas / parks and gardens identified on the HER or historic maps, isolated archaeological finds as identified on the HER, previously unidentified non-designated assets of demonstrably local significance.
Uncertain	Non-designated heritage assets whose significance could not be ascertained

1.13 Conservation areas have been identified as being either of medium or high significance because although the power to designate comes from national legislation, the criteria for designation is decided locally, unlike listed buildings that have nationally recognised designation criteria that is applied consistently across the country by a national body.

Conversely, the 1990 Act only instructs local authorities to identify 'which parts of *their area* are areas of special architectural or historic interest' (LUC emphasis) and so their interest relates to a regional level, rather than a comparison to any national standards. Where they are demonstrably of national significance, however, they can be identified as being of high significance and these cases were identified using professional judgement.

1.14 Also note that 'negligible' is not included as a level for the purposes of the high-level assessment. This is because environmental features of negligible or no heritage significance would not be considered heritage assets and so therefore would be screened out as part of the assessment process because they would not register a score against the SA framework. This is in line with paragraph 039 of Planning Practice Guidance, which recognises that '*a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets*'.

1.15 In order to translate the effects on heritage significance / harm (in NPPF terminology) into the above framework, the following assumptions were applied:

- Development parameters for the preferred and reasonable alternative sites are not yet decided. Broad assumptions for the likely scale and character of development were made, based on the expected uses of the sites in the AAP, and the conclusions on site capacity, options and massing in the Tower Hamlets East of the Borough Characterisation & Site Capacity Study (Allies and Morrison/Urban Practitioners, October 2020) (note this only applies to five of the 10 sites).
- The potential for development to affect the historic environment in the study area was informed by a systematic 'RAG' assessment² for all allocation sites and reasonable alternatives. This study considered the significance of known heritage assets – designated or otherwise – and historic landscape character, and used informed, professional judgement to assess the sensitivity of assets to change and likely levels of effect to their significance. Archaeological potential was considered in relation to the pattern and significance of known assets (drawn from the HER and other data sources) in the vicinity and site land use history to understand the level of potential and likely effects.
- No assumptions were made with regard to the potential for mitigation to be applied; this would require detailed, site-specific understandings of both heritage assets (their

² 'RAG' assessment: (RAG = 'Red-amber-green') a strategic approach to assessing both the significance of heritage assets, their sensitivity

to change as a consequence of development and the likely level of effect to that significance.

significance and the contribution of setting to that significance) and of development proposals to understand the potential interactions and opportunities to avoid or mitigate harm.

- Assessments are policy neutral, and make no assumptions with regard to the application of local or national policy. (Where there are interactions with other legislative regimes – e.g. the need for scheduled monument consent – this is highlighted.)

1.16 For individual sites, a precautionary approach was taken at this high-level stage, with ratings applied in line with the following assumptions:

- Assets of high significance that could experience physical impact as a consequence of development were given a significant negative score (--).
- Assets of high significance likely to be sensitive to setting change:
 - (--) if effect is likely to be significant and negative.
 - (-) if effect is likely to be negative.
 - (0) if effect is likely to be negligible/none or if setting makes no contribution to significance.
- Assets of medium or low significance that could experience physical impact as a consequence of development were given a negative score (-).
- Assets of medium or low significance likely to be sensitive to setting change:

- (-) if effect is likely to be significant and negative.
- (0) if effect is likely to be negligible/none or if setting makes no contribution to significance

- Non-designated assets where significance is demonstrably equivalent to that required for designation (i.e. national significance test for scheduling) and the effect is likely to be significant and negative, either physically or through setting change, were given a significant negative score (--)
- Other non-designated assets that could experience physical impact as a consequence of development were given a negative score (-).
- Where archaeological potential is identified but there is insufficient information to make a judgement on the likely levels of significance, these were given an uncertain effect score (?).
- Where effects include potential harm to previously unrecognised heritage assets, an uncertain effect score (?) was added to the score for other effects relating to the known historic environment.

1.17 When the levels of significance (Figure 1.2) and the above assumptions are plotted against the SA framework (Figure 1.1), it produces a matrix as shown below in Figure 1.3.

Figure 1.3: Resulting SA scores derived from level of heritage significance and type of impact vs the potential level and direction of effects on that significance

	Assets of high significance		Assets of medium or low significance	
	Physical impact	Setting impact	Physical impact	Setting impact
Significant positive effect	++	++	+	+
Minor positive effect	+	+	+	+
Negligible or no effect	0			
Minor negative effect	--	-	-	-
Significant negative effect	--	--	-	-
Uncertain effect	?			

Task 3: preliminary report

1.18 This methodology was applied to 10 sites (6 preferred and 4 reasonable alternatives) to ensure the baseline assessment has been applied consistently. The outcome of the strategic assessment was provided in tabular form in electronic format for review by the client and relevant stakeholders.

1.19 This task correlates to step two of Historic England's (2015) HEAN 3 guidance for the selection of site allocations.

Chapter 2

Site assessments

Site Ref/Name	Expected use	Non-designated assets	Designated assets	Heritage at Risk / Opportunities	SA Score
Aberfeldy Estate	Residential, community and retail uses and open space. Existing town centre within the site would need to be reprovided. (‘E1: Aberfeldy Estate’ in Characterisation & Site Capacity Study 2020)	No known non-designated assets within the site, but it is within the Lea Valley APA which indicates it has potential to contain palaeoenvironmental remains. This is backed up by the results of a watching brief on Ada Gardens (GLHER ref. ELO2642) that recorded a series of peat deposits with palaeoenvironmental potential. Prehistoric pottery is also recorded on Culloden Street (GLHER ref. MLO63920) and prehistoric ditches to the north-east of the site (GLHER ref. MLO74420). Any buried heritage assets present within the site could experience physical impact as a consequence of development.	There are no designated assets within the site. The site is in close proximity to two conservation areas, Balfron Tower and Langdon Park. These CAs, as well as the grade II listed buildings within them, are likely to experience setting change. This is not likely to affect their architectural interest/value, however, development of this site could challenge their prominence and distract attention from them. The grade II listed former Bromley Hall School (NHLE ref. 1402561) is in close proximity to the site and would be likely to experience setting change as a result of development, however the asset would be screened by boundary walls and the development is unlikely to affect its architectural and historical value.	The grade II listed former Bromley Hall School (NHLE ref. 1402561) is a building at risk. It is local authority-owned and site redevelopment may present opportunities to unlock potential for conversion/rehabilitation.	-
Teviot Estate	Residential, community and retail uses and open space.	There is one locally listed building at the southern end of the site (LST ref. 173) and one just outside of the site boundary (LST ref. 174) that are likely to experience physical or setting change as a result of development.	The south-western corner of the site is a key part of Langdon Park Conservation Area, containing the grade II listed Church of St. Michael and All Angels (NHLE ref. 1065049) and the grade II listed War Memorial (NHLE ref. 1357874). These assets could experience physical impact or setting	No assets identified as being heritage at risk are recorded in the national or local datasets.	--

	<p>('E2: Teviot Estate' in Characterisation & Site Capacity Study 2020)</p>	<p>The site is within the Lea Valley APA which indicates it has potential to contain palaeoenvironmental remains. The GLHER records the discovery of a palaeolithic hand axe within the site (GLHER ref. MLO11206) which corroborates this.</p> <p>Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p>	<p>change as a result of development. Their significance would be affected owing to the southern half of the conservation area having a village-like quality centred around the Victorian church and its grounds.</p> <p>The site is immediately to the south of Limehouse Cut Conservation Area, and opposite several listed buildings (both grade II and II*) along the A12 Blackwall Tunnel Northern Approach, which could experience setting change affecting their significance as a result of development.</p>		
72-90 Crisp Street	<p>Residential, community and retail uses.</p> <p>('S4: Crisp Street' in Characterisation & Site Capacity Study 2020)</p>	<p>No known non-designated assets within the site, but it is within the Lea Valley Archaeological Priority Area (APA) which indicates it has potential to contain palaeoenvironmental remains. A watching brief north of the site (GLHER ref. ELO7559) did not produce any archaeological remains.</p> <p>Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p>	<p>Site contains no designated assets. It is situated within 500m of 5 conservation areas (CAs) (Balfron Tower, Langdon Park, Lansbury, St Mathias Church and All Saints Church). These CAs contain numerous grade II and several grade II* listed buildings. Sensitivity to meaningful setting change is limited by screening due to modern development and vegetation, however a new c.20 storey tower could cause visual incursion/distraction or challenge the prominence of the historic tall buildings in the landscape, particularly the grade II* listed Balfron Tower (NHLE ref. 1334931).</p>	<p>No assets identified as being heritage at risk are recorded in the national or local datasets.</p>	
Orchard Wharf	<p>Residential, community, retail, office and employment uses.</p>	<p>No known non-designated assets within the site, but it is within the Limmo APA which indicates it has the potential to contain palaeoenvironmental and Victorian industrial archaeological remains. An evaluation on land immediately to the east of the site (GLHER ref.</p>	<p>There are no designated assets within the site.</p> <p>There are a number of grade II listed structures along the northern bank of the Thames which could experience setting change affecting their significance, due to their inter-relationship along the waterfront being potentially eroded, such as</p>	<p>No assets identified as being heritage at risk are recorded in the national or local datasets.</p>	

	('S1: Orchard Wharf' in Characterisation & Site Capacity Study 2020)	<p>17468) concluded that no part of the original dock wall at Union Wharf remains. Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p> <p>The Thames Archaeological Survey (TAZ ref. FTH24) records a 19th century timber causeway to the south of the site that could experience setting change.</p>	<p>Trinity House Buoy Wharf Quay and Orchard Dry Dock (NHLE ref. 1242315) and Blackwall Pier and Entrance Lock to Former East India Dock Basin (NHLE ref.1260086). However, meaningful setting change would be limited due to screening by modern development.</p>		
Empson Street SIL	Employment.	<p>There is a locally listed building (LST ID. LST128) almost immediately to the north-east of the site on Empson Street that could experience setting change as a result of development.</p> <p>The site is within the Lea Valley APA which indicates it has potential to contain palaeoenvironmental remains. The GLHER records the discovery of a Bronze Age hoard within the site (GLHER ref. MLO11205) which indicates a potential for prehistoric remains.</p> <p>Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p>	<p>The centre of the site is within the Limehouse Cut Conservation Area, and immediately north of the canal along which most of the CA is delineated. The character of the CA is defined by the canal and associated industrial buildings, one of which was a former match factory within the site. Development could have a physical impact on the CA and affect its significance through change to its canalside setting.</p> <p>There is a grade II* listed building, The Widow's Son Public House (NHLE no. 1065801) is located to the west of the site and could experience setting change as a result of development, but this is unlikely to detract from its architectural interest.</p>	No assets identified as being heritage at risk are recorded in the national or local datasets.	
Blackwall Trading Estate	Residential and employment uses. Re-provision of all existing industrial	No known non-designated assets within the site, but it is within the Lea Valley APA which	There are no designated assets within the site, or any in its vicinity that are likely to experience setting change as a result of development.	No assets identified as being heritage at risk are	

	space would be supported.	<p>indicates it has potential to contain palaeoenvironmental remains.</p> <p>The GLHER records a geoarchaeological investigation on Leven Road (GLHER ref. 19826) immediately west of the site that recorded deposits relating to the Devensian period of glaciation, so there could be potential for similar deposits within the site.</p> <p>Any buried heritage assets present within the site could experience physical impact as a consequence of development</p>		recorded in the national or local datasets.	
Leamouth Depot	<p>Residential, community, retail, office and employment uses.</p> <p>(‘S3: Council Depot’ in Characterisation & Site Capacity Study 2020)</p>	<p>No known non-designated assets within the site, but it is within the Limmo APA which indicates it has the potential to contain palaeoenvironmental and Victorian industrial archaeological remains. Two prehistoric weapons have been found on Leamouth Road to the south of the site, suggesting there is some potential for similar remains the area.</p> <p>Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p>	<p>A grade II listed entrance gateway (NHLE ref. 1357528) is located at the south-west boundary of the site. The asset could experience physical impact as a consequence of development. The gateway and grade II boundary wall opposite the site are both dated to the early 19th century and would experience meaningful setting change as the development of up to 410 homes would affect their historical relationship with the west bank of the mouth of the River Lea.</p> <p>Other 19th century grade II listed buildings relating to the East India Company Dock further to the west of the site in the vicinity of Nutmeg Lane, or those in Canning Town on the east bank of the Lea (in the London Borough of Newham), are unlikely to experience meaningful setting change due to intervening development.</p>	No assets identified as being heritage at risk are recorded in the national or local datasets.	--

<p>Ailsa Street Waste Site</p>	<p>Co-location of residential and waste uses.</p>	<p>The GLHER records a non-designated post-medieval Gate Lodge (GLHER ref. MLO37385) within the site that could experience physical impact and setting change as a result of development.</p> <p>The site is within the Lea Valley APA which indicates it has potential to contain palaeoenvironmental remains. Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p>	<p>The site is partially within, and surrounded by, Limehouse Cut Conservation Area (CA). The character of the CA is defined as a broad canal, towpath and associated historic buildings. The features of the CA could experience physical impact and setting change as a result of development, affecting its special architectural or historic character.</p> <p>Immediately to the north of the site is the grade II listed Former Gillender Street Fire Station (NHLE ref. 1393719), while the grade II* listed Bromley Hall (NHLE ref. 1357791) is located immediately to the south of the site. The proximity of these listed buildings means they could experience physical impact as a result of development, and are very likely to experience setting change, in the case of Bromley Hall with particular likelihood to affect its significance owing to its historical relationship with the site. There are two other grade II listed buildings along Gillender Street within the CA that are likely to experience setting change as a result of development.</p>	<p>No assets identified as being heritage at risk are recorded in the national or local datasets.</p>	<p>--</p>
<p>Stroudley Walk</p>	<p>Residential and community uses and open space.</p> <p>Existing town centre within the site would need to be reprovided.</p>	<p>The northern section of the site is within the Bow APA which covers the historic settlement and surrounds of Bromley-by-Bow, containing a wide range of medieval and post medieval settlement, commercial and religious activity from over 700 years. A 2009 DBA of 3 potential regeneration sites identified a high potential for archaeological deposits (GLHER ref. ELO11949). Various recent evaluations around the Bromley High Street area support this by</p>	<p>The site contains several listed buildings, mainly relating to the 18th and 19th century development of the area such as Drapers' Almshouses and Chapel, Priscilla Road (NHLE 1065079) and Bromley Public Hall, Bow Road (NHLE 1251500), which could experience physical impacts.</p> <p>There are groups of listed buildings adjacent to the north and west sides of the site which could</p>	<p>How Memorial Gateway, Bromley High Street (NHLE 1065281) within the site is a listed building at risk. Also at risk, to the north edge of the site along Bow Road, 2 bollards (NHLE 1262757), gentlemen's public convenience</p>	<p>--</p>

		<p>revealing evidence of development ranging from post-medieval to 19th century. Locations of non-designated monuments recorded in the GLHER, such as Bromley by Bow Palace (GLHER ref. MLO2362) and St Mary's burial ground (GLHER ref.MLO71229) indicate potential for remains of significance.</p> <p>The remainder of the site is within the Lea Valley APA, indicating it has potential to contain palaeoenvironmental remains.</p> <p>Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p> <p>There are two locally-listed buildings within the site, 116 Bow Road, The Bow Bells (LST200) and Bromley-by-Bow United Reformed Church, Bruce Road (LST168) which could experience physical impact.</p> <p>A group of locally-listed buildings on the north side of Bow Road from the Fairfield Road junction eastwards, directly opposite the northern edge of the site, have potential to experience change to their setting. These buildings represent a varied group of high-street commercial, residential and institutional buildings ranging from the 17th to mid-20th century. Their historical significance as part of the historic high street could be affected by development of the site.</p>	<p>experience setting change affecting their significance, owing to their relationship with the historic core and street form of Bromley-by-Bow.</p> <p>An ensemble of listed historical industrial structures east of the River Lea around Three Mills and the Bromley-by-Bow gasholders is unlikely to be affected by the development of the site owing to distance and intervening development.</p> <p>The Fairfield Road Conservation Area wraps around the north and west sides of the site and could experience setting change affecting its significance, particularly relating to the development of the south side of Bow Road.</p>	<p>(NHLE 1392968) and Church of St Mary Stratford Bow (NHLE 1065273). Opportunities for these to be incorporated into regeneration/public realm proposals, particularly the local authority-owned gateway and street furniture.</p>	
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<p>Devons Road</p>	<p>Residential and community uses and open space. Existing town centre within the site would need to be reprovided.</p>	<p>There are three locally listed buildings (LST. ID. LST131, 155 and 194) within the site which could experience physical impacts.</p> <p>The site is within the Lea Valley APA which indicates it has potential to contain palaeoenvironmental remains.</p> <p>Any buried heritage assets present within the site could experience physical impact as a consequence of development.</p>	<p>The entirety of Swaton Road Conservation Area is located within the site, so it could experience physical impacts and setting change as a result of development. The character of the CA is an isolated remnant of Victorian working class family dwellings, so development has the potential to change this character and to disrupt views along the street axes within the CA.</p> <p>The site is also immediately north of Limehouse Cut CA and south of Tower Hamlets Cemetery CA, both of which could experience setting change affecting their significance as a result of development. The latter also contains a cluster of listed buildings which could experience setting change.</p> <p>There is one GII* listed building within the site, The Widow's Son Public House, Devons Road (NHLE no. 1065801), which could experience physical impacts as a result of development.</p>	<p>Tower Hamlets Cemetery Conservation Area to the north west of the site is identified as heritage at risk, along with a number of listed structures within it.</p>	<p>--</p>
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Chapter 3

Conclusions

3.1 This initial assessment finds that all sites have the potential for negative effects to the historic environment. This is as a result of a relatively high density of both designated and non-designated heritage assets within and around the allocated sites and preferred alternatives, and the fact that they all lie within Archaeological Priority Areas. The significant negative effects arise where there is potential for physical impacts to designated assets within or at the site boundaries, as well as effects to setting.

3.2 Five of the 10 sites are found to have potential for significant negative effects:

- Teviot Estate
- Leamouth Depot
- Ailsa Street Waste Site
- Stroudley Walk
- Devons Road

3.3 The method and findings of this assessment have been integrated into the IIA of the AAP, and are reflected in the report sections on cumulative effects, mitigation/monitoring and conclusions.

3.4 As a result of the assessment conclusions, the five sites above are recommended for Heritage Impact Assessment at Stage 2. The purpose of Stage 2 is to look in greater detail at the potential for harm to heritage assets arising from the chosen sites. The precise scope and detail of such a study may vary, but would usually consist of communicating a clear understanding of the significance of each affected asset, including any contribution made by setting, and how the allocation site relates to that significance. An assessment would be made of the type and level of impact that would result from development of the site, individually and cumulatively. Recommendations and site-specific policies can then be formed for avoiding or minimising harm and taking opportunities for enhancement, conforming with steps 3 and 4 of Historic England's (2015) HEAN 3 guidance for the selection of site allocations.