

Heritage Addendum

Land north of Carisbrook Road, Mitcheldean, September 2026

PINS Ref: APP/P1615/V/26/3378822

LPA Ref: P0672/25/OUT

This Heritage Addendum has been prepared by Rosey Meara, of CSA Environmental, on behalf of Gladman Developments Limited, in relation to Land north of Carisbrook Road, Mitcheldean. It provides a summary of the position with regards to the setting of designated heritage assets.

1.0 Introduction

- 1.1 This Heritage Addendum has been prepared by Ms Rosemary (Rosey) Meara MA (Hons), PGCert, MCIfA, Associate Director (Archaeology & Heritage), of CSA Environmental.
- 1.2 I have been a heritage professional since 2005. I have a MA (hons) degree in Archaeology (First Class) and a Postgraduate Certificate in Historic Conservation (Distinction). I am a professionally accredited Member of the Chartered Institute for Archaeologists. I am CSA's Archaeology and Heritage lead.
- 1.3 I have prepared heritage assessments for numerous planning applications, predominantly in relation to residential developments. I routinely assess the significance of heritage assets, and the potential impacts of proposals on that significance, including through alteration to setting.

2.0 Background

- 2.1 This Heritage Addendum has been prepared on behalf of Gladman Developments Limited in respect of the refusal by Forest of Dean District Council of an outline planning application at Land north of Carisbrook Road, Mitcheldean.
- 2.2 Reason for Refusal 3 states:

"The proposed development fails to take proper account of and, causes unacceptable harm to the significance of the affected designated heritage asset the Grade I Listed St Michael and All Angels Church which on balance is considered to be greater than the benefits of allowing the application. As a consequence it fails to preserve the special architectural and historic interest of the affected listed building and its setting, as required under Sections 66 and 72 of the Planning

(Listed Buildings and Conservation Areas) Act 1990 and the national guidance set out in the National Planning Policy Framework.

- 2.3 Following submission of the planning application, Forest of Dean District Council withdrew RfR3.
- 2.4 I was appointed to prepare this Heritage Addendum in September 2026 following the Inspector's Pre-Conference Note, which identifies the effect on the Grade I listed St Michael and All Angels Church (listed as the 'Church of St Michael and All Angels') as a main issue.

3.0 Assessment

- 3.1 I prepared the Archaeology & Heritage Assessment submitted with the planning application, this includes a Heritage Setting Assessment (CD1.20). This Archaeology & Heritage Assessment updated a report I had prepared in relation to a previous application P1994/18/OUT.
- 3.2 The Grade I listed Church of St Michael and All Angels is located c. 525m south of the application site, within Mitcheldean Conservation Area. The Grade II listed Laggars Barn and Yard Walls is located c. 300m east of the application site.
- 3.3 The called-in application would result in, at the very most, negligible harm to the significance of the Grade I listed Church of St Michael and All Angels and Mitcheldean Conservation Area, through the reduction of non-key views to the church. Under the 2024 NPPF this equated to less than substantial harm, at the very lowermost end of this harm spectrum. Under the 2026 NPPF this equates to harm, at the very lowermost end of the harm spectrum, at worst.
- 3.4 The called-in application would not harm the significance of the Grade II listed Laggars Barn and Yard Walls, or any other designated heritage assets.

4.0 Legislation and the NPPF

- 4.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act) sets out legislation relating to listed buildings. Section 66(1) of the 1990 Act states that:

in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or, as the case may be, Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses

- 4.2 The 1990 Act does not reference the setting of conservation areas. Section 72(1) of the 1990 Act does not apply.

- 4.3 Policy HE6 of the NPPF relates to Proposals affecting designated heritage assets. HE6.4 states *"Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal."*
- 4.4 Policy HE7 of the NPPF relates to Decisions on non-designated heritage assets. HE7.2 states *"Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal"*.

5.0 Consultee Responses and Officer's Report

- 5.1 The Conservation Officer response to the current planning application was provided by Minette Matthews, Senior Conservation Officer, Forest of Dean District Council. This stated that *"the proposed development will cause no discernible level of harm or loss of significance to the heritage asset identified above"*, i.e. Mitcheldean Conservation Area and Church of St Michael and All Angels (CD 3.19).
- 5.2 The Conservation Officer section of the Officer's Report (CD4.1) notes that there is no heritage objection, that there would be no harm to the setting of the Conservation Area, and that there would be limited or no impact on the views of the church.
- 5.3 I conclude that the called-in application will result in, at the very most, negligible harm to the significance of the Grade I listed Church of St Michael and All Angels and also, as a result, negligible harm to Mitcheldean Conservation Area. This comprises harm at the very lowermost end of this spectrum, at worst. This is agreed in the Statement of Common Ground.

6.0 3rd Party Responses

- 6.1 A number of 3rd Party Responses refer to harm to the Grade I listed Church of St Michael and All Angels. Potential harm to the Church of St Michael and All Angels has been appropriately assessed in the Archaeology & Heritage Assessment submitted with the application. I conclude that the called-in application will result in, at the very most, negligible harm to the significance of the Grade I listed Church of St Michael.
- 6.2 For the avoidance of doubt, where 3rd Party Responses refer to the village or settlement of Mitcheldean, and its setting, character and appearance, this should not be confused with the conservation area. The 'village' is not synonymous with the conservation area. In the application of heritage policies, it is the heritage asset which must be assessed, not the wider village or settlement. Potential harm to Mitcheldean Conservation Area has been appropriately assessed in the Archaeology & Heritage Assessment submitted with the application. I

conclude that the called-in application will result in, at the very most, negligible harm to the significance of Mitcheldean Conservation Area.

7.0 Conclusions

- 7.1 The called-in application would result in, at the very most, negligible harm to the significance of the Grade I listed Church of St Michael and All Angels and Mitcheldean Conservation Area, through the reduction of non-key views to the church.
- 7.2 With regards to the Grade I listed church, Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies. Section 72(1) of this Act related to development *within* a conservation area and does not apply.
- 7.3 Under the 2026 NPPF, negligible harm equates to harm, at the very lowermost end of the harm spectrum, which should be weighed against the public benefits. Comment on the planning balance is provided by Michael Dinn.