



Heritage Technical Note

McCormack House, 56a East Street, Havant

Livelihood Technology Ltd

Prepared by:

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SLR Project No.: 433.066582.00001

July 2025

Revision: 02

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
01	15 July 2025	NB	JE	JT
02	28 July 2025	NB	JE	JT

Basis of Report

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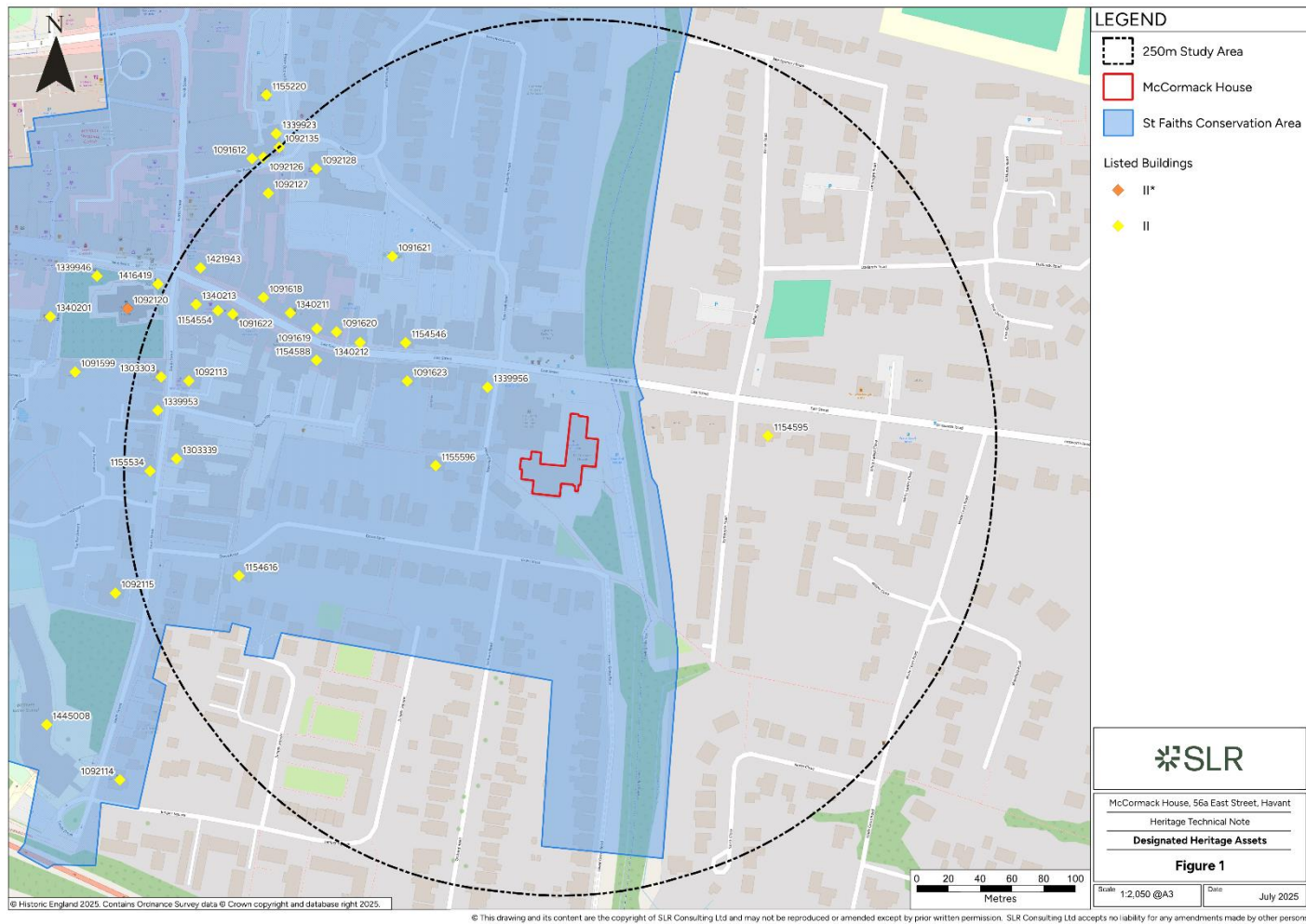


Figure 1 Designated heritage assets



1.0 Introduction

1.1 Project Background

SLR Consulting Ltd was commissioned by Livelink technology Limited (hereafter, the 'Client') to produce a Heritage Technical Note to append to a planning supporting statement for a planning application at McCormack House (56a East Street, Havant) (NGR: SP 88759 19206), hereafter 'the Site'. The building concerned within this proposal falls within the St Fails Conservation Area and is located c. 265 metres east of Havant town centre.

This assessment has been prepared in compliance with, and with regards to, the National Planning Policy Framework (NPPF) (2025), and the Havant Borough local Plan (2011)., Historic England guidance, in addition to standards set out by the Institute of Historic Building Conservation (IHBC) and the Chartered Institute for Archaeologists (CIfA). Relevant local plan policies are included at the back of this report (**Appendix A**).

The methodology employed during this appraisal was based upon relevant professional guidance, including the CIfA's *Standard and guidance for historic environment desk-based assessment* (CIfA 2020), and relevant technical guidance issued by Historic England, including *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (2019). A methodology and glossary of key terms is included at the back of this report (**Appendix B**).

1.1.1 Description of proposal

The proposed works are entirely internal and involve the reconfiguration of the existing office spaces. No changes are proposed to the building's external appearance, including its roofline, materials, or fenestration. Additionally, there will be no alterations to the building's footprint or its surrounding landscaping.

A detailed description of the proposed works is provided within the accompanying plans submitted as part of this application.

1.1.2 Planning Background

Planning permission (reference no.: 23804/9) was granted on 6 February 1981 for a proposed office development of 1,394 square metres and a proposed library of 2,117 square metres. The current McCormack House building was constructed following this approval.

In the 21st century a planning application (reference no.: APP/23/00996) was submitted for McCormack House. The proposal sought permission to change the building's use from office space (Class E) to an educational facility (Class F1). However, the project was withdrawn despite having received approval (Havant Borough Council 2024).

No further planning applications have been found in relation to the building within the Havant Borough Council Planning Portal.

2.0 Historical Background

St Faiths, Havant

The St Faith's Conservation Area forms the historic core of Havant, centred around St Faith's Church and the crossroads of North, South, East, and West Streets. The area has origins dating back to the Roman period and saw significant development during the medieval period, including the granting of market rights in 1200 and again in 1451 (Havant Borough Council & Purcell 2024, 3). Although a major fire in the 1760s caused substantial damage, the historic street layout was largely preserved (*ibid.*). In the 19th century, Havant experienced further growth, driven by industries such as parchment making and brewing, supported by the presence of natural springs and the arrival of the railway in 1847 (*ibid.*).

McCormack House

The current site holds no notable architectural, artistic, historical, evidential, or communal value, nor does it make a significant contribution to the character and appearance of the St Faiths Conservation Area. It was developed atop the former gardens associated with the neighbouring property. A full cartographic regression is provided below.

2.1 Cartographic Regression

Consultation of historic mapping showed that whilst there are a number of early pictorial maps of the area, none of these are at a sufficient scale to provide detail of the proposed Site.

Tithe mapping from 1840 (**Plate 1**) indicates that the majority of the Site was located within Plot 547, known as Town Ends Field. This land was owned by Dr. Thomas Griffiths and tenanted by George Knight (Tithe Apportionment: IR 29/31/123). The southernmost portion of the current Site extended into Plot 551, which formed part of approximately 11 acres of managed arable land owned and occupied by Edward Woodcock. The western edge of the Site also slightly overlapped with Plots 550 and 548, which included a now-demolished barn, yard, and small field enclosure associated with Plot 551, all under the same ownership and occupation.

By the time of the 1859 six-inch Ordnance Survey map (**Plate 2**), the Site was situated just east of the newly constructed Town Hall (now The Spring Arts Centre). The barn complex recorded on the tithe map had been expanded to include additional dwellings and outbuildings, forming a small farmstead first labelled as 'Eastend Cottage'. This development marked the early stages of urban expansion in the area. To the east, the newly introduced Hayling Railway Line, running north–south, defined the Site's eastern boundary and reflected the growing transport and industrial infrastructure in semi-rural Havant.

No significant changes are recorded within the Site until the 1895 25-inch Ordnance Survey map (**Plate 3**), which shows a rectangular detached building immediately west of the Site (now recognised as the distinctive flint-walled house now forming part of The Spring). At this time, the Site itself appears to have been incorporated into the gardens of this historic residence.

Mapping from the early to mid-20th century illustrates the gradual urbanisation of Havant, with the former farmland surrounding Eastend Cottage increasingly developed into suburban terraces. RAF aerial photography from 1946 (RAF/3G/TUD/UK/156) confirms that the site remained undeveloped and continued in use as a garden well into the mid-20th century. By this time, none of the earlier cottage or barn structures, formerly located near the current McCormack House, remained.

It is not until satellite imagery from 1999 (**Plate 4**) that the current L-plan building in the Site is first visible. Subsequent imagery, through to the present day, shows no further notable

changes. This late 20th century development of the Site is likely to have truncated any surviving remains associated with the former farmstead, particularly within the eastern peripheries of the Site.

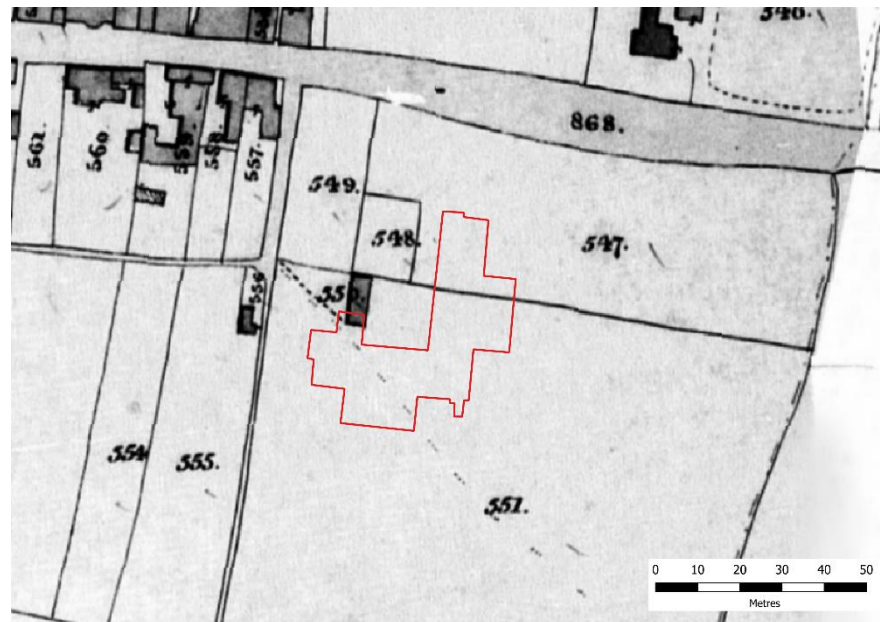


Plate 1 1840 Tithe map

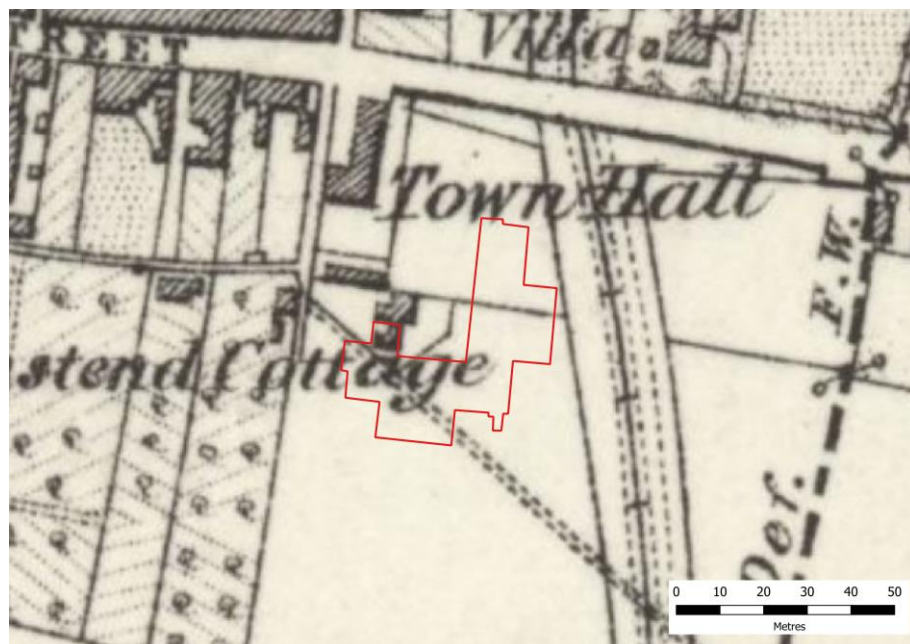


Plate 2 1859 Ordnance Survey map

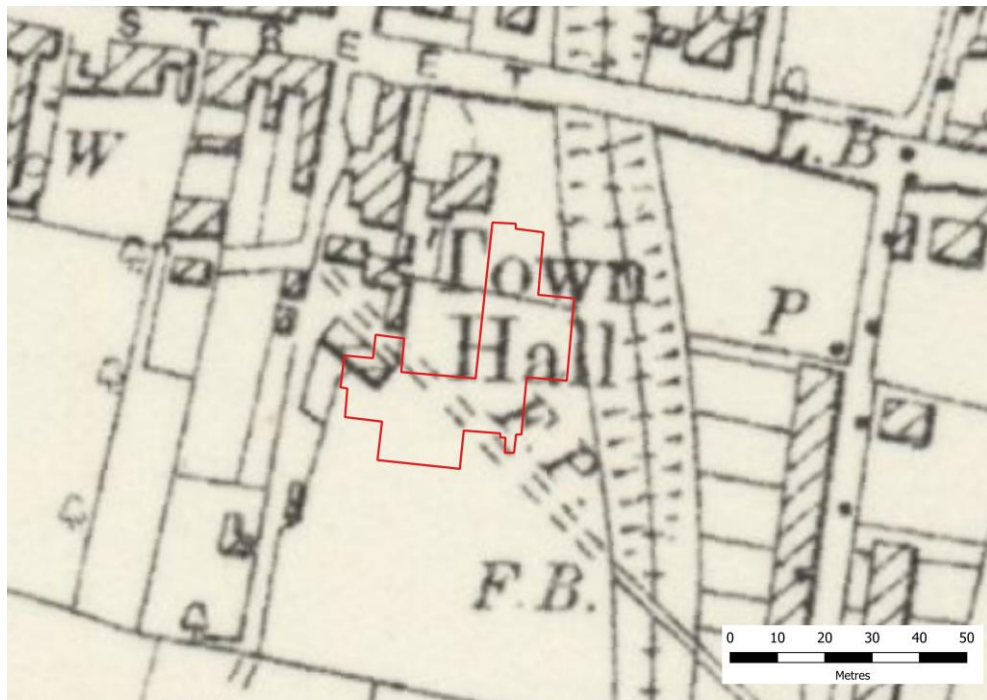


Plate 3 1895 25-inch Ordnance Survey map



Plate 4 1999 Satellite Imagery (©Google Earth 2025)

3.0 Site Description

The Site at 56A East Street (McCormack House) currently comprises a two-storey, brick-built commercial office building constructed in the late 20th century. Formerly in use under Class E for business or service purposes, the building features a modern design with multiple internal rooms and office spaces, making it adaptable for a range of uses. It is fully self-contained, with dedicated access points and on-site facilities.

To the east of the building lies a car park, which forms part of the adopted highway. This area includes two designated disabled parking bays at the front of the building and is also used by visitors to nearby amenities, such as The Spring Arts Centre and the Hayling Billy Trail. No additional buildings or structures are present on the Site beyond McCormack House itself.

McCormack House is not considered a heritage asset and does not share a direct historical or architectural association with the surrounding historic governmental or commercial buildings of East Street that contribute to the character and appearance of the St Faith's Conservation Area.

3.1 Setting

Positioned just off East Street, a principal route through Havant, the Site is surrounded by a mix of civic, commercial, and residential uses. It lies on the eastern periphery of the St Faith's Conservation Area and within 250 metres of approximately 27 Grade II listed buildings, the majority of which are concentrated in the town centre to the west. Due to the linear east–west alignment of East Street, intervisibility between the Site and these designated heritage assets is limited. The closest listed buildings include:

- **Gothic Cottage (Grade II, NHLE: 1155596)**, located approximately 50 metres west of the site.
- **Kingsway House (Grade II, NHLE: 1339956)**, located approximately 55 metres north-west of the site.

In addition to these designated assets, several non-designated heritage assets contribute to the immediate setting of McCormack House. These include the neighbouring former Town Hall (now The Spring Arts Centre immediately west), the former Post Office building directly north of the Site, and the historic route of the Hayling Railway Line (immediately east of the Site).

While the surrounding historic environment of St Faith's Conservation Area is defined by a varied architectural vernacular, including Georgian neo-classical, Victorian Arts and Crafts, and 20th century Art Deco styles, McCormack House itself is a modern structure of no particular architectural or heritage value. As such, it makes no contribution to the character or significance of the local historic environment.

Furthermore, the building's recessed position, relative to the established development grain, along East Street reduces its visibility within key views of the conservation area.

The remaining heritage assets within the defined 250-metre study area share no direct historical or spatial associations with the Site and are not afforded any notable intervisibility. For these reasons, the Site does not form part of the setting for any further heritage assets.

4.0 Scoping

The Site comprises modern, late 20th century office buildings located within the St Faith's Conservation Area. The significance of the Site and its contribution to the local historic environment is therefore considered below.

No proposed redevelopment within the Site would directly affect the fabric of any of these recognised heritage assets. Furthermore, it is not anticipated that any changes would impact the significance of designated or non-designated heritage assets located outside the Site boundary, including those within the defined 250-metre study area, through changes to their setting. As such, there is no heritage-based constraint that would preclude development of the site in principle (detailed in Section 6 below).

Designated heritage assets within the 250m Study Area in **Figure 1**.

5.0 Statement of Significance

In line with the requirements of the NPPF, this section of the report will set out the significance of any identified heritage assets, and the contribution that setting, and the Site, makes to its significance, if any.

The heritage interests pertaining to the assets identified above, and the contribution of those interests to the assets' significance, are described below.

5.1 McCormack House

The Site comprises entirely redeveloped land, with all existing structures dating from the late 20th century. There are no designated or non-designated heritage assets located within the Site boundary. As such, the Site presents no visible heritage significance.

Furthermore, the Site is considered to have negligible archaeological potential. Although historic mapping indicates that ancillary farmyard structures associated with Eastend Cottage once extended slightly into the Site, these were demolished during the 20th century. Subsequent redevelopment in the late 20th century is likely to have significantly truncated or removed any surviving remains, leaving no appreciable archaeological interest within the Site.

5.2 St Faiths Conservation Area

The St Faith's Conservation Area, originally designated in 1994, encompasses the historic core of Havant Town Centre (Havant Borough Council & Purcell 2024, 3). Centred around the intersection of North, East, South, and West Streets, the area forms a distinctive cruciform street pattern that reflects the town's medieval origins. It contains a rich mix of historic building types, 19th and 20th century suburban development, and the site of a former parchment works adjacent to Homewell Spring (a key natural feature that historically supported local industry) (*ibid.*).

The conservation area is notable for its architectural diversity, including a range of listed and locally important buildings that display Georgian, Victorian, and 20th century Art Deco styles. These varied structures contribute to the area's distinctive and somewhat fragmented character. St Faith's also holds archaeological interest, with evidence of continuous settlement from the medieval period onward.

McCormack House lies within the boundary of the St Faith's Conservation Area, but it is a modern, utilitarian building of late 20th century construction. It lacks architectural or historic merit and does not reflect the traditional materials, scale, or detailing that characterise the conservation area. As such, it is not identified as a positive contributor in the Conservation

Area Appraisal, and it is not considered as a positive or neutral contributor to the area's character.

Its design, massing, and materials are out of keeping with the surrounding historic context, and it does not contribute to the architectural or historic significance of the area. Furthermore, the building's set-back position relative to the established development grain along East Street further conceals it from key views, limiting its visual presence and any potential contribution to the setting of the conservation area.

5.3 Gothic Cottage

Gothic Cottage, located at 14 and 16 Town Hall Road, is a Grade II Listed pair of semi-detached houses built in 1850. It is a well-preserved example of mid-Victorian Gothic Revival domestic architecture, featuring red brick in Flemish bond, yellow brick quoins, steep gables with decorative bargeboards, and cast-iron diamond-pattern casement windows.

Gothic Cottage presents architectural, artistic and evidential interest within its classic Victorian-era architectural style, and despite some later alterations, it retains its original form and detailing, offering insight into 19th century suburban development and middle-class housing.

The buildings setting is defined by its position within a cohesive group of historic residential and civic buildings that reflect the town's Victorian-era development along Town Hall Road.

McCormack House is a modern, utilitarian office block located to the east of Gothic Cottage. It is not visible in key views of Gothic Cottage and does not form part of its immediate historic context. As such, McCormack House makes no positive contribution to the setting or significance of Gothic Cottage. Its presence is considered neutral.

5.4 Kingsway House

Kingsway House, at 2 Town Hall Road, is a Grade II Listed early 19th century building, originally a house and cottage, now used as offices. The building also showcases architectural, artistic and evidential interest, particularly within the stucco with a tiled roof, it features Georgian proportions, sash and casement windows, rusticated quoins, and decorative porches. Despite later alterations, it retains its historic character and high level of detailing.

The setting of Kingsway House is urban, situated within the St Faiths Conservation Area, along Town Hall Road and East Street, that includes several other listed buildings such as Magnolia House, Gothic Cottage, and The Limes. All of which line the well-defined terraced streets, directing throughflow to the town centre.

McCormack House, is a modern, utilitarian office block located near Kingsway House but separated by intervening buildings and car parking of The Spring. It lacks the architectural quality, materials, and scale that define the character of Kingsway House and its historic context. Again, its stepped back positioning along East Street means that it is not visible in key views of and from Kingsway House and does not form part of its immediate setting.

McCormack House makes no positive contribution to the setting or significance of Kingsway House. Its presence is considered neutral, and the proposed internal alterations to McCormack House would not affect the setting, character, or heritage value of the listed building (further explored in Section 6 below).

5.5 Former Town Hall (The Spring)

The Former Town Hall, now The Spring Arts & Heritage Centre, is a former civic building in Havant, constructed in 1870 in the Gothic Revival style by architect Richard William Drew. It

presents architectural and artistic interest in its red brick walling with stone dressings, it features a symmetrical five-bay frontage, a central arched entrance with a fanlight and pediment, and a tower with mullioned and transomed windows. Other decorative elements such as quatrefoils and cusped windows enhance its architectural character.

The non-designated heritage asset presents historic interest in its original use as a public events venue; the building became the meeting place for Havant Urban District Council in 1921. It remained in civic use until 1977, after which it was converted into an arts centre, reopening in 1978. Today, it holds high amounts of communal value within its use as a theatre and museum, continuing its role as a community hub.

McCormack House does not feature in key views of the heritage asset due to its recessed position from the street frontage. Its visual and stylistic disconnection from the surrounding historic context further limits its contribution to the setting of the conservation area.

Again, McCormack House makes no positive contribution to the setting or significance of the Former Town Hall due to its varying form from the prevailing character of the area. Although there are high amounts of intervisibility between the Site and The Spring, none of the key views of the former Town Hall are interrupted by McCormack House.

5.6 Former Post Office Building

The former Post Office, located on East Street and directly opposite the Site, is a notable example of 1930s Art Deco civic architecture. Built in 1936, the building carries the royal cipher of Edward VIII, marking its construction during his brief reign.

The building presents architectural and artistic interest within its symmetrical principal south facing façade, streamlined form, and stylised geometric detailing reflect the influence of the Art Deco movement, which was rare in small-town civic buildings of the period.

The building served as a central hub for postal services in Havant for much of the 20th century, contributing to the town's civic and commercial development. Though no longer in use as a post office, it remains a prominent and architecturally distinctive feature of the town centre.

Situated within the St Faith's Conservation Area, the former Post Office contributes positively to the architectural variety and civic character of East Street. It forms part of a group of historic and civic buildings that define the area's identity and evolution through the 19th and 20th centuries.

McCormack House does not contribute to the visual or historical setting of the former Post Office and is not part of any key views or groupings that define the area's significance.

As a result, McCormack House makes no positive contribution to the setting or significance of the former Post Office. For the same reasons outlined in relation to the other nearby heritage assets, the Site's location, architectural form, and lack of historic association limit its relevance to the character and context of this non-designated heritage asset.

5.7 Former Hayling Railway Line

The Former Hayling Railway Line, known locally as the Hayling Billy Line (The Hayling Site 2025), is a non-designated heritage asset of local significance. Opened in 1867, it connected Havant to Hayling Island and operated until its closure in 1963. The line played a vital role in the economic and social development of the area, supporting passenger travel, tourism, and the transport of goods, particularly during the Victorian and Edwardian periods, contribution to the assets historical interest.

Although the physical railway infrastructure has been removed, the route remains legible in the landscape and has been repurposed as the Hayling Billy Trail, a popular walking and

cycling path (*ibid.*). This adaptive reuse preserves the historic alignment and continues to connect communities along the coast.

The setting of the former railway is defined by its linear alignment, historic associations, and continued public use as a walking and cycling trail. It retains a strong sense of place and contributes to the industrial and transport heritage of the borough.

Although located immediately adjacent, McCormack House does not form part of the historic infrastructure of the Hayling Railway Line, nor does it contribute to the line's landscape character or heritage value.

Again, despite its relative proximity, McCormack House makes no contribution to the setting or significance of the Former Hayling Railway Line. The proposed internal alterations to McCormack House are not expected to affect the historic character, setting, or public appreciation of this non-designated heritage asset.

6.0 Impact Assessment

As outlined in Section One, and detailed further in the accompanying application, the proposed works to McCormack House are entirely internal. There will be no alterations to the external façades or surrounding landscaping. Consequently, there will be no visible change to the setting of any of the heritage assets identified above.

The proposed works will change the use of McCormack House from office / business use to that of residential use. This change, however, will not have any impact upon how the conservation area is experienced. This is due to the proposals not having any impact upon the historic layout and character of the conservation area, and they will preserve the external appearance of the building. Additionally, the change of use would secure the long-term viability of a vacant / underused building.

Given the internal nature of the proposed works, and the lack of any anticipated influence on the character and appearance of the St Faith's Conservation Area, nearby listed buildings, or non-designated heritage assets discussed in Sections Four and Five, the alterations are not considered to have any impact on the setting or significance of these assets.

Furthermore, as the proposals do not involve any ground disturbance, there is no risk of impacting subsurface archaeological remains. This includes the possible highly truncated farmyard remains located in the eastern part of the building, as identified through historical mapping.

In summary, the proposed internal works are expected to result in a **neutral impact** on the local historic environment.

7.0 Conclusion

The proposed internal works to McCormack House will not result in any changes to its external appearance or the surrounding landscape. As such, there will be no impact on the setting or significance of nearby heritage assets, including the St Faith's Conservation Area, as well as other listed and non-designated buildings within the immediate vicinity and the defined 250-metre study area. Additionally, the works will not affect any potential archaeological remains in proximity to the site. Given the entirely internal nature of the proposals, the works are assessed to have a **neutral impact** on the local historic environment.

Overall, it is concluded that the proposed scheme complies with all relevant local and national planning policies, including the National Planning Policy Framework (NPPF, 2025), the Havant Borough Local Plan (2011)—specifically Policy CS11—and the Havant Borough Council Design Guide (2011).

8.0 Bibliography

8.1 Policy, Guidance and Legislation

Chartered Institute for Archaeologists., 2020. *Standards and guidance for Historic Environment Desk-based Assessment*. Available at: <http://www.archaeologists.net/codes/ifa> [accessed 18 July 20245]

English Heritage., 2008. *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*. Available at: <https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/> [accessed 18 July 2025]

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Ministry of Housing, Communities and Local Government (DCLG)., 2005. *National Planning Policy Framework*. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [accessed 18 July 2025]

Planning (Listed Buildings and Conservation Areas) Act 1990. Available at: <http://www.legislation.gov.uk/ukpga/1990/9/contents> [accessed 18 July 2025]

8.2 Archival Sources

IR 29/31/123- Tithe apportionment of Havant (parish), Hampshire. Valuation: Charles Osborn, Fareham, Hampshire. Held by The National Archives, Kew.

RAF/3G/TUD/UK/156- 1946, Historic England Archive (RAF photography)

8.3 Grey Literature

Havant Borough Council. 2024. *McCormack House, 56A East Street, Havant, PO9 1BS: Change of use from office use (Class E) to education use (Class F1) and associated external alterations to the building and its curtilage, including provision of a multi-use games area (MUGA) and new fencing*. Havant, Havant Borough Council

8.4 Websites

The Hayling Site. 2025. *Hayling Billy Line / The Coastal Path*. Available at: [Hayling Billy Line / The Coastal Path | Hayling History | Hayling Island Site](#). {Accessed 18 July 2025}.

Appendix A Relevant local planning policy

Havant Borough Local Plan: Core Strategy (2011)

Policy CS11 Protecting and Enhancing the Special Environment and Heritage of

Havant Borough

Planning permission will be granted for development that:

- 1 Ensures the key landscape and built form principles set out in the Havant Borough *Townscape, Landscape and Seascape Character Assessment* are protected and where possible enhanced by partnership working with developers, groups and the wider community.
- 2 Protects and where possible enhances the borough's statutory and non-statutory designated landscape, habitats and features of biological, hydrological or geological interest. Protection and enhancement will be achieved by appropriate adaptation and mitigation measures including wardening, education and information and the creation of new habitats, water bodies/courses planting of new trees and woodland.
- 3 Has particular regard to the following hierarchy of nature conservation designations within the borough (as identified on the *Proposals Map*):
 - Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar [International].
 - Sites of Special Scientific Interest (SSSI) and National Nature Reserves [National].
 - Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR), other Ancient Woodland not identified in (ii) above [Local].
- 4 Protects and where appropriate enhances the borough's statutory and nonstatutory heritage designations by appropriately managing development in or adjacent to conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest.

- 5 Supports an ongoing programme of survey of habitats and species and designation of *Sites of Importance for Nature Conservation*.
- 6 *Incorporates partnership working with conservation organisations to improve public understanding of biodiversity and to manage public access to designated sites, particularly on the coast, to reduce harm to nature conservation interests.*
- 7 *Incorporates partnership working with landowners and developers to ensure land management practices restore, enhance and where appropriate create new valued landscapes, habitats and their soil structure, particularly the ancient woodland remnants of the Forest of Bere and coastal salt marsh.*
- 8 *Protects wildlife habitats and wildlife corridors to prevent the fragmentation of existing habitats and to allow species, for example Brent Geese, to respond to the impacts of climate change by making provision for habitat adaptation e.g. coastal managed realignment and species migration.*
- 9 *Maintains undeveloped gaps between the settlements of Emsworth/Havant; Havant/Waterlooville; Havant/Portsmouth; Emsworth/Westbourne and Leigh Park/Rowlands Castle as shown on the Proposals Map.*
- 10 *Protects the best and most versatile agricultural land that has the greatest potential for local food security.*
- 11 *Responds to the emerging evidence from the Solent Disturbance and Mitigation Project, the published recommendations, and future related research.*

Appendix B Methodology and Glossary of Key Terms

Methodology

Standards

The assessment has been undertaken in accordance with all relevant statute, policy, and guidance. The assessment has been project managed and signed off by John Trehy, Technical Discipline Manager Archaeology and Heritage (MCIfA), and undertaken by Natalie Barker, Senior Built Heritage Consultant (ACIfA).

Study area

A 250-metre study area was used to create a baseline for assessment, factoring any heritage assets beyond the study area where any meaningful visual, spatial, thematic, or historic functional association was identified.

Sources

Relevant map and document resources were consulted during the preparation of this report. The National Heritage List for England (NHLE) was consulted to provide information on scheduled monuments, registered parks and gardens, registered battlefields, and listed buildings. Available published and unpublished documents were consulted, and historic land-use has been reconstructed. Sources consulted are listed in the Bibliography section at the end of the report.

Key Terms

Heritage assets

The NPPF defines heritage assets as: *a building, monument, Site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).*

Significance

The NPPF defines significance as: *the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, 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.*

Current national guidance for the assessment of the significance of heritage assets expresses significance in terms of 'interests', as used within this report, and as per the NPPF definition (see *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England 2019). Interests are analogous with 'special interest' as used within the Planning (Listed Buildings and Conservation Areas) Act 1990, and with the 'values' as set out in Historic England's *Conservation Principles, Policies and Guidance* (English Heritage 2008). The interests set out under the NPPF include:

- *Archaeological Interest: there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- *Architectural and Artistic Interest: these are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.*
- *Historic Interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

These interests should not be seen as prescriptive, but rather as a guide for understanding the significance of a heritage asset; for example, a heritage asset may have interests beyond the scope of archaeological, architectural, or historic interest – they may have communal value or may be significant for their group value, etc.

This assessment was also informed by the advice published by Historic England in the document entitled *Managing Significance in Decision-Taking in the Historic Environment: Good Practice Advice in Planning Note 2* (2015).

Setting

The NPPF defines setting 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.*

The setting assessment within this report was guided by the recommendations outlined in *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning. Note 3* (Historic England 2017), which align with the general EIA process. The guidance advocates a staged approach to the assessment of the effects of development on the significance of heritage assets due to a change within their setting, using a five-step process:

Step 1: Identify which heritage assets and their settings are affected by the proposed development

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow their significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance of the identified heritage assets, or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm to that significance

Step 5: Make and document the decision and monitor outcomes

Harm

Potential development effects (impacts) to heritage assets are discussed in terms of 'harm', with reference to the NPPF (2025). Harm, in heritage terms, relates to a negative effect stemming from a change which results in a diminishment of the significance of a heritage asset, or the ability to appreciate that significance. The NPPF allows that harm may be either substantial or less than substantial and may vary within each category. How harm is assigned will trigger differing tests under the NPPF. Where harm to a designated heritage asset, or a non-designated heritage asset of equivalent significance, is identified, it must be given great weight in the planning decision. While it is up to the decision maker to determine the nature and degree of harm, they must take into account necessary expertise, and the particular significance of any heritage asset which may be affected (NPPF paragraphs 212-217).

- **Substantial harm (or total loss of significance)**
An impact which results in a '*...total loss of significance...*' (NPPF paragraph 212). The National Planning Policy Guidance sets out that 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*'. Substantial harm can be defined as having '*such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced*'; and
- **Less than substantial harm**
Being any lesser level of harm than that defined above; recent case law has confirmed that this includes any level of harm (not considered substantial) regardless of its quantification, e.g., the finding of a 'negligible' level of harm to a designated heritage asset must still be treated as less than substantial harm and be weighed in the balance under paragraph 215.

The PPG provides that the category of harm identified for any given asset be 'explicitly identified', and that the extent of that harm be 'clearly articulated'. For purposes of this assessment, this is done with reference to a 'spectrum', e.g., at the lower/upper end of the spectrum of less than substantial.

Where an impact, or harm to, the significance of a non-designated heritage asset is identified, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Where there is no harm to a heritage asset, an impact may be neutral (preserve) or may enhance its significance.

As clarified in the High Court, preservation does not mean that change is not possible; it specifically means no harm. This is echoed in *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2* (GPA 2), which states that '*Change to heritage assets is inevitable but it is only harmful when significance is damaged*'.



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