

Quobleigh Breach One Horton Heath Eastleigh

Built Heritage Impact Assessment

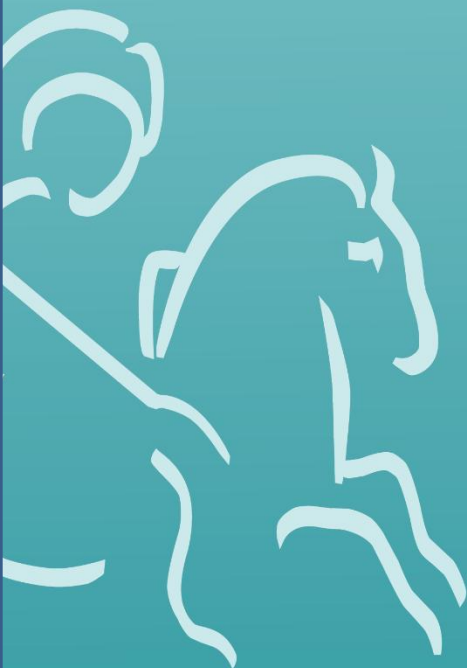


Report prepared for:
Eastleigh Borough Council

CA Project: AN0366

CA Report: AN0366_1

October 2025



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date	October 2025
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signed	
date	October 2025
issue	1

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SUMMARY

Project Name: Quobleigh Breach Heritage Impact Assessment

Location: One Horton Heath

NGR: 448473, 117463

In 2025 Cotswold Archaeology was commissioned by Eastleigh Borough Council to produce a Built Heritage Impact Assessment to examine the effects of the Reserved Matters planning application for the residential parcel known as 'Quobleigh Breach' on the significance of built heritage assets within the environs of the site. Fir Tree Farmhouse, a Grade II Listed Building adjacent to the site, was the only heritage asset deemed sensitive to the proposals. The Quobleigh Breach scheme, which is part of the wider One Horton Heath Masterplan, is for the erection of 269 new residential units with associated car parks, access roads and landscaping. One Horton Heath was granted Outline Planning Permission for mixed use development comprising up to 2,500 houses in October 2025 (ref. O/20/89498).

Fir Tree Farmhouse was built in the 18th century and comprises a polite, high status small country house formerly associated with a courtyard farmstead to the south, which was demolished in the 20th century. It lies within an associated fieldscape of agricultural character, and its immediate setting comprises a spacious enclosed garden.

A settings assessment has been undertaken to understand what matters and why to the significance of the Listed Building in terms of its setting. This found that setting makes a meaningful contribution to its significance; positive attributes being the wider agrarian landscape surrounding it which provides the backdrop for understanding its former function, and its immediate garden grounds which allows for the best appreciation and experience of the aesthetic value of the Listed Building.

An assessment of effects has found that the proposed scheme will bring substantial change to the physical character and experience of the wider setting of the Listed Building (its immediate setting is preserved). In conjunction with the development permitted in outline to the east of the Listed Building (reserved matters parcel The Holme and Homestal), this change will erode the understanding and appreciation of the Listed Building as a farmhouse within an associated agricultural landscape and thus its historic illustrative interest. The level of effect is found to be less than substantial such that its significance is reduced but still appreciable. As per paragraph 215 of the National Planning Policy Framework 2024, the level of harm found as a result of the proposals to the significance of Fir Tree Farmhouse should be placed in the planning balance against the public benefits of the proposal.

1. INTRODUCTION

- 1.1. In 2025 Cotswold Archaeology was commissioned by Eastleigh Borough Council to undertake a Heritage Impact Assessment with regard to an application for the approval of reserved matters (appearance, layout, scale and landscaping) for the development of 269 dwellings, associated open space, landscaping, parking and other associated works, pursuant to outline permission O/20/89498, at One Horton Heath, Eastleigh, Hampshire.
- 1.2. The application boundary (hereafter referred to as ‘the Site’) comprises agricultural land either side of Fir Tree Lane and the recently constructed new north-south link road, vegetation along the boundaries, SUDS and pumping station (built in association with the link road) and a construction compound on site of the former farm buildings immediately to the west of the Grade II Listed Fir Tree Farmhouse (Fig. 1, NGR: 448473, 117463).

Project background

- 1.3. The northern and southern parts of the wider OHH site were previously subject to two separate outline planning applications for mixed use developments, with permission granted in November 2017 (O/16/79354) and December 2017 (ref. O/14/75735), respectively.
- 1.4. Subsequently, a new outline planning application was submitted, bringing together the two previous application areas under a single masterplan (ref. O/20/89498), submitted in December 2020. This planning application was supported by a Heritage Assessment (Cotswold Archaeology 2020) for the entire OHH site.
- 1.5. The proposed development has been designed in full accordance with the Development Plan and Outline Planning Application (OPA) O/20/89498, which was granted permission in October 2025. The report forms part of a Reserved Matters planning submission for the residential parcel at Quobleigh Breach.

Objectives and professional standards

- 1.6. This assessment focuses on the potential impacts of the proposed development on built heritage assets to inform decision making for the reserved matters application. A separate assessment has been prepared to inform decision making with regards to archaeology (CA 2025).

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- 1.7. Cotswold Archaeology is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA). This report has been prepared in accordance with appropriate standards and guidance, including the ‘Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment’ (Historic England 2015), further clarifies that a desk-based assessment should:

‘...determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation’ (Historic England 2015, 3).

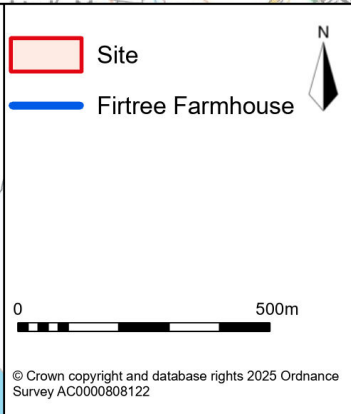
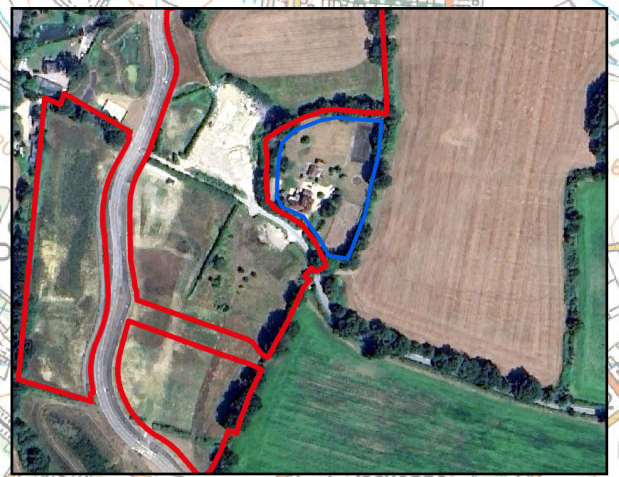
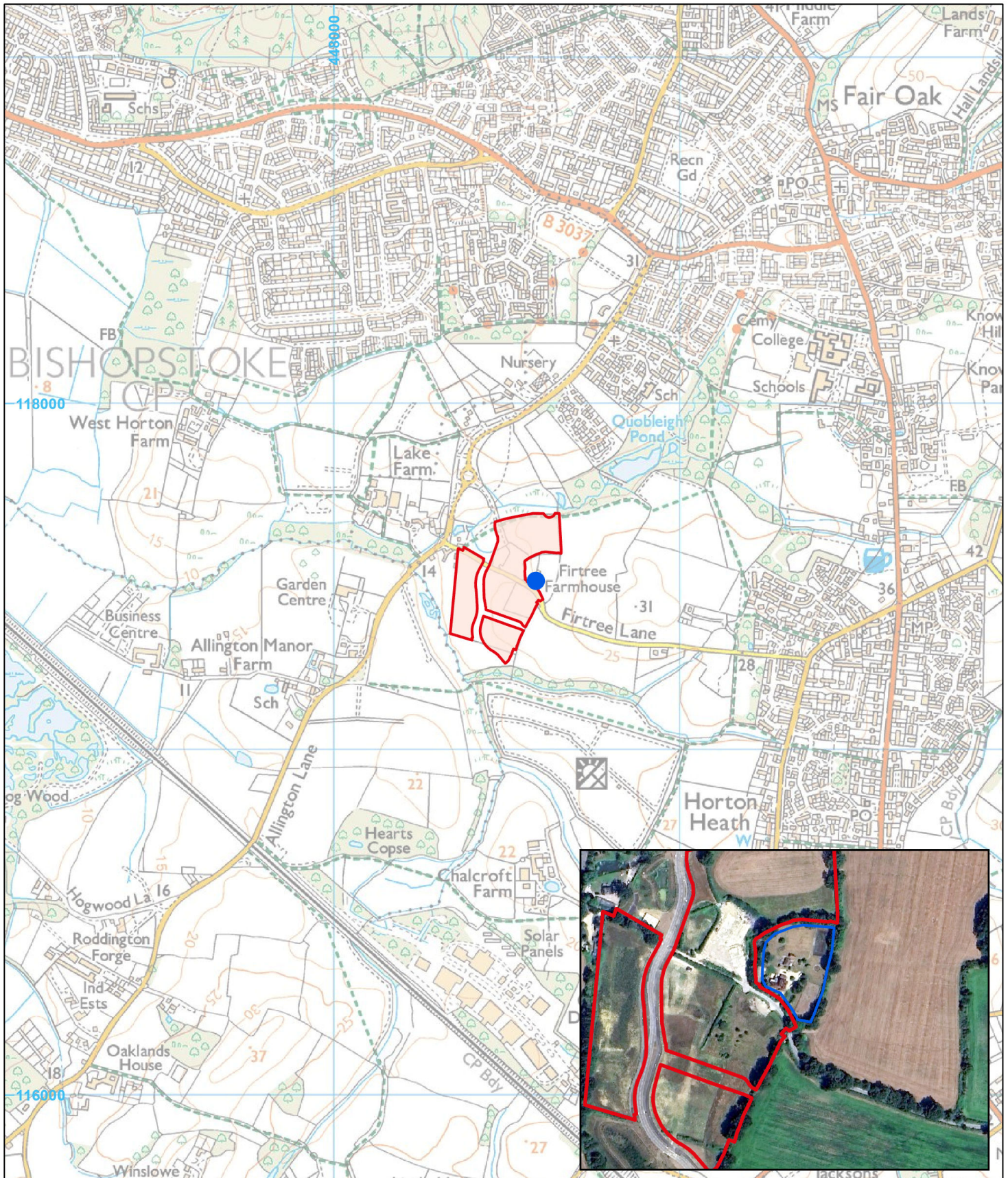
Statute, policy and guidance context

- 1.8. The Site is located in the local authority of Eastleigh Borough Council. Planning and development are currently guided by the Eastleigh Borough Local Plan 2016-2036, which was adopted on 25 April 2022.
- 1.9. This assessment has been undertaken within the key statute, policy and guidance context presented within Table 1.1. The applicable provisions contained within these statute, policy and guidance documents are referred to, and discussed, as relevant, throughout the text. Fuller detail is provided in Appendix 1

Statute	Description
National Heritage Act 1983 (amended 2002)	One of four Acts of Parliament providing for the protection and management of the historic environment, including the establishment of the Historic Monuments & Buildings Commission, now Historic England.
Planning (Listed Buildings and Conservation Areas) Act (1990)	Act of Parliament placing a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.
National Planning Practice Guidance (updated July 2019)	Guidance supporting the National Planning Policy Framework.
National Planning Policy Framework (2024)	Provides the English government’s national planning policies and describes how these are expected to be applied within the planning system. Heritage is subject of Chapter 16 (page 59).

Statute	Description
Eastleigh Borough Local Plan 2016-36	Comprises the local development plan (local plan), as required to be compiled, published and maintained by the local authority, consistent with the requirements of the NPPF (2024). Intended to be the primary planning policy document against which planning proposals within that local authority jurisdiction are assessed. Where the development plan is found to be inadequate, primacy reverts to the NPPF (2024).
Conservation Principles (Historic England 2008)	Guidance for assessing heritage significance, with reference to contributing heritage values, in particular: <i>evidential</i> (archaeological), <i>historical</i> (illustrative and associative), <i>aesthetic</i> , and <i>communal</i> .
Good Practice Advice in Planning: Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015)	Provides useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
Good Practice Advice in Planning: Note 3 (GPA3): The Setting of Heritage Assets, Second Edition (Historic England, 2017)	Provides guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

Table 1.1 Key statute, policy and guidance



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PROJECT TITLE
 One Horton Heath, Quobleigh Breach and Fir Tree Farm Hub

FIGURE TITLE
 Site Location Plan

DRAWN BY FC **PROJECT NO.** AN0366 **FIGURE NO.**
CHECKED BY JS **DATE** 27/10/2025 **1**
APPROVED BY JS **SCALE @ A4** 1:15,000

2. METHODOLOGY

Data collection, analysis and presentation

- 2.1. This assessment has been informed by a proportionate level of information sufficient to understand the significance and potential impacts of the proposed scheme on built heritage assets. Information sources which inform this assessment include:
- Cotswold Archaeology (CA) 2020 *Heritage Desk Based Assessment*
 - CGMS 2018 *Built Heritage Assessment Fir Tree Farmhouse*
- 2.2. Additional data and analysis was taken from the Environmental Impact Assessment Heritage Chapter (CA 2020a) submitted as part of outline application O/20/89498.
- 2.3. A site visit was also undertaken as part of this assessment. The primary objectives of the site visit were to assess the Listed Building within its setting. The wider landscape was examined, as relevant, from accessible public rights of way.

Settings Assessment

- 2.4. This work includes a settings assessment. It is specifically focussed on understanding the potential impact of the proposed development on the significance of heritage assets as a result of alteration to those parts of their setting which contribute to their significance and the way they are experienced. As described above, the focus of the work will assess the extent and type of any contribution of setting to the significance of nearby Listed Buildings, most notably Fir Tree Farmhouse.
- 2.5. The work is informed and underpinned by the best practice methodology published in Historic England's Good Practice Advice in Planning Note 3 (GPA3) guidance on *The Setting of Heritage Assets* (2017). The physical and experiential setting of the assets is examined in proportionate detail, including what aspects or attributes of setting contribute positively, negatively or do not contribute to significance. As GPA 3 states:
- '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' (p2).*
- 2.6. As is described in GPA3 (and in Annex 2 of the National Planning Policy Framework (NPPF) 2024), not all aspects of an asset's setting contribute to their significance, in

other words, some elements of setting do not contribute, or the contribution is neutral. The guidance is also clear that consideration of views, which are a part of settings assessments, can be valued for reasons other than their contribution to heritage significance. The guidance states in referring to views:

‘they may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning considerations.....the consideration of views in the planning process may be partly or wholly separate from any consideration of the significance of heritage assets (p1)’.

2.7. This makes it clear that it is important to understand what parts of a setting are relevant to an understanding and appreciation of the asset and its significance, and what are not. There can often be confusion or misunderstanding in this regard, as some aspects of setting can be pleasing, attractive and cherished, but not contribute to heritage value. Change in a view to or from a heritage asset does not always bring harm to it as that view may not contribute in a meaningful way to its significance or experience, it may just be incidental. As identified in the above quote in paragraph 2.5, considerations related to landscape beauty, urban design and/or townscape amenity are often conflated with effects on heritage significance.

2.8. This assessment undertakes Steps 1-3 of the staged approach advocated in GPA3; Step 1 looks to identify which assets may be potentially affected by changes in their setting. Step 2 assesses the degree to which these settings make a contribution to the heritage significance of the asset or allow significance to be appreciated. This is done by developing an understanding of the specific values (historic, evidential and aesthetic) contributing to overall significance and secondly analysing how and what aspects of setting contribute to those specific values. Step 3 assesses the likely effects of potential generic development of the Site on significance bearing in mind and utilising the findings of Step 2. The assessment will also examine any mitigation that may be required in-line with Step 4 of the guidance.

2.9. Historic England is also clear within the guidance that conserving the significance of heritage assets by taking their settings into account need not prevent change and goes on to state:

‘many places coincide with the setting of a heritage asset and are subject to some degree of change over time’ (p.8)

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- 2.10. For a development to result in harm to a heritage asset it must have the potential to impact its heritage significance negatively or to harm the way in which it is understood and experienced. Change to the character of setting does not necessarily result in harm to its significance. Whether the change to the setting has a harmful impact on the specific values which form overall significance, is the sole matter for consideration within the settings assessment.

Assessment of heritage significance

- 2.11. The significance of heritage assets which may be affected by the proposed development, has been assessed and described, in accordance with paragraph 207 of the NPPF (2024), the guidance issued by ClfA (2020), Historic Environment Good Practice Advice in Planning Note 2 (Historic England 2015), Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England 2019) and Advice Note 17: Planning and Archaeology (Historic England 2022). Determination of significance has been undertaken according to the industry-standard guidance on assessing heritage value provided within Conservation Principles (English Heritage 2008). This approach considers heritage significance to derive from a combination of discrete heritage values, principal amongst which are: i) evidential (archaeological) value, ii) historic (illustrative and associative) value, iii) aesthetic value, iv) communal value, amongst others. Further detail of this approach, including the detailed definition of those aforementioned values, as set out, and advocated, by Historic England, is provided in Appendix 1 of this report.

Assessment of potential development effects (benefit and harm)

- 2.12. The present report sets out, in detail, the ways in which identified susceptible heritage assets might be affected by the proposals, as well as the anticipated extent of any such effects. The effects of mitigation by design are also discussed.
- 2.13. Identified effects upon heritage assets have been defined within broad 'level of effect' categories (Table 2.2). These are consistent with key national heritage policy and guidance terminology, particularly that of the NPPF (2024). This has been done in order to improve the intelligibility of the assessment results for purposes of quick reference and ready comprehension. These broad determinations of level of effect should be viewed within the context of the qualifying discussions of significance and impact presented in this report.

- 2.14. It should be noted that the overall effect of development proposals upon designated heritage assets are judged, bearing in mind both any specific harms or benefits (an approach consistent with the Court of Appeal judgement *Palmer v. Herefordshire Council & ANR* Neutral Citation Number [2016] EWCA Civ 1061).

Level of effect	Description	Applicable statute & policy
Heritage benefit	The proposals would better enhance or reveal the heritage significance of the heritage asset.	Enhancing or better revealing the significance of a heritage asset is a desirable development outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF paragraphs 203 and 219.
No harm	The proposals would preserve the significance of the heritage asset.	Preserving a Listed building and its setting is consistent with s66 of the Planning (Listed Buildings and Conservation Areas) Act (1990). Sustaining the significance of a heritage asset is consistent with paragraph 203 of the NPPF, and should be at the core of any material local planning policies in respect of heritage.
Less than substantial harm (lower end)	The proposals would be anticipated to result in a restricted level of harm to the significance of the heritage asset, such that the asset's contributing heritage values would be largely preserved.	In determining an application, this level of harm should be weighed against the public benefits of the proposals, as per paragraph 215 of the NPPF.
Less than substantial harm (upper end)	The proposals would lead to a notable level of harm to the significance of the heritage asset. A reduced, but appreciable, degree of its heritage significance would remain.	Proposals involving change to a Listed building or its setting, or any features of special architectural or historic interest which it possesses, or change to the character or appearance of Conservation Areas, must also be considered within the context of Sections 7, 66(1) and 72(2) of the 1990 Act. <i>The provisions of the Act do not apply to the setting of Conservation Areas.</i>
Substantial harm	The proposals would very much reduce the heritage asset's significance or vitiate that significance altogether.	Paragraphs 212 - 215 of the NPPF would apply. Sections 7, 66(1) and 72(2) of the Planning Act (1990), and the Ancient Monuments and Archaeological Areas Act (1979), may also apply. In relation to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 216 of the NPPF.

Table 2.2 Summary of level of effect categories (benefit and harm) referred to in this report in relation to heritage assets, and the applicable statute and policy.

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- 2.15. As noted above, this assessment examines non-physical built heritage impacts only. It does not examine the archaeological resource; this is assessed in an Archaeological Desk Based Assessment (CA 2025).

3. THE SETTING OF HERITAGE ASSETS

- 3.1. This section considers potential non-physical effects upon the significance of susceptible heritage assets within the Site environs. Non-physical effects are those that derive from changes to the setting of heritage assets as a result of new development. Those assets identified as potentially susceptible to non-physical impact, and thus subject to more detailed assessment, are discussed in greater detail within the remainder of this section.

Step 1: Identification of heritage assets potentially affected

- 3.2. Step 1 of the Second Edition of Historic England's 2017 'Good Practice Advice in Planning: Note 3' (GPA3) is to 'identify which heritage assets and their settings are affected' (see Appendix 1). GPA3 notes that Step 1 should identify the heritage assets which are likely to be affected as a result of any change to their experience, as a result of the development proposal (GPA3, page 9).
- 3.3. Heritage assets identified as part of Step 1 as potentially susceptible to impact as a result of changes to their setting is the Grade II Listed Fir Tree Farmhouse (Fig. 1 inset)
- 3.4. Nearby Listed Buildings in the historic settlement of Fair Oak include the Grade II Listed Ramblers Cottage in Chapel Drove (NHLE ref: 1281402) and the Grade II Listed Saxon Court in Burnett's Lane (NHLE ref: 1111947). Both are some distance from the Site and surrounded by modern development. Whilst backing onto a more open landscape, the Grade II Listed The Bush in Botley Road (NHLE ref: 1204040), is substantially screened from the Site by an existing copse and playing fields and is of sufficient distance from the Site so as not to be affected by change within its setting. There are no other discernible (non-visual) historical or landscape associations between any of these assets and the Site. As such, the proposals will not result in any non-physical harm to the significance of these assets, and they have not been assessed in any further detail.
- 3.5. There are two locally listed buildings, Elgin Lodge and Lakesmere House at Fair Oak Lodge to the north of the Site, and a further locally listed building, The Lodge in Botley Road to the north of The Bush. All three of the locally listed buildings are of sufficient distance from the Site so as not to be affected by change within their settings.

Step 2: Assessment of setting

- 3.6. This section presents the results of Step 2 of the settings assessment, which has been undertaken in regard to those potentially susceptible heritage assets identified in Step 1. Step 2 considers the contribution that setting makes to the significance of potentially susceptible heritage assets.

Fir Tree Farmhouse (Grade II Listed)

- 3.7. Fir Tree Farmhouse was listed at Grade II (NHLE ref: 1111949) in 1983 with the following list description:

C18. 2 storeys. 3 windows. Hipped roof (early C19 re-roofing) with large moulded cornice. Red brick walling, in Flemish and also Monk Band, cambered arches flush, quoins in Bath Stone, plinth. Sashes in exposed frames, north side ground floor stone bay. Coarse Ionic stone porch. Late C19 rearward extension of lesser height, but in style.



Photo 1 East front of Fir Tree Farmhouse

- 3.8. Although the listing description suggests Fir Tree Farmhouse to be 18th century, a 1984 journal article (Course and Moore, see CA 2020) in the *Proceedings of the Hampshire Field Club & Archaeological Society* states the building to have been rebuilt in 1897, despite retention of a beam dated 1661, retaining a number of late

Victorian features. It has a polite appearance to the principal façade, fronting east onto a forecourt (Photo 1).

Historic Context

- 3.9. Fir Tree Farm is depicted on both the 1791 map by Milne and the First Edition OS map of 1806 (not reproduced, see CA 2020), however the detail is limited such that it is only possible to recognise two clusters of buildings on either side of Fir Tree Lane. The first map to show the buildings at Fir Tree Farm in any detail is the 1825 Great Allington Enclosure Map (Fig. 2).

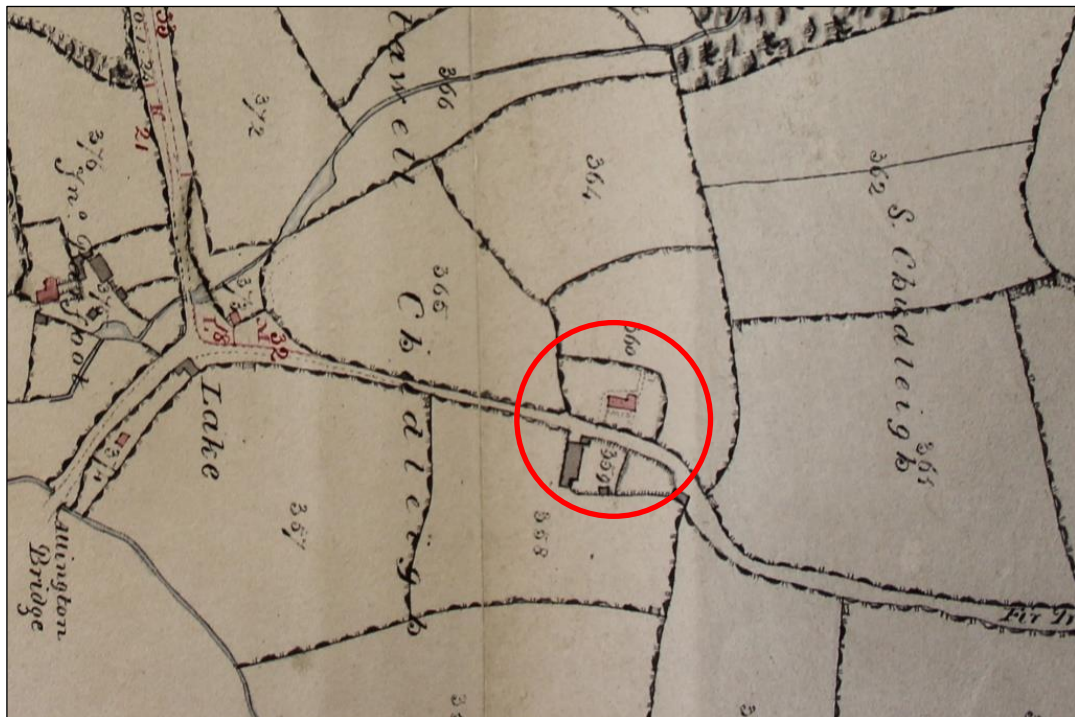


Fig.2 Extract of 1825 Great Allington Enclosure Map showing Fir Tree Farm (circled in red, together with outbuildings and orchard)

- 3.10. The 1840 Bishopstoke Tithe Map (Fig. 3) depicts Fir Tree Farmhouse, together with three outbuildings to the south of Fir Tree Lane, in the ownership of Stawell Cudleigh, occupied by John Barfoot who was the owner of nearby Lake Farm at that time. Its lands, on both sides of the lane, adjoined Foxholes Farm on the edge of Horton Heath to the east, owned and occupied by Stephen Dummer.
- 3.11. Until the First Edition OS Map, all of the early maps depict a large barn to the west of the yard (HER ref: 41869) together with the coach house to the east (HER ref: 41871). The 1868 map (Fig. 4) shows an addition to the south-east corner of the main barn (HER ref: 41870), as well as a range of animal sheds to the northern boundary. The

farmhouse is shown fronting east onto a forecourt, with gardens laid out to the north and west. Surrounding to the east and north is a large area of orchard buffering the house from the surrounding fieldscapes.



Fig. 3 Extract of 1840 Bishopstoke Tithe Map (farmstead circled in red, together with outbuildings and orchard)

- 3.12. There are virtually no changes to the farmstead until the mid-20th century, when various buildings were added on the east side of the yard and an addition to the west side of the main barn, outside of the farmyard (no longer extant).
- 3.13. Notably, the farmhouse faces away from the farmyard to the south which implies a slightly higher status to the building, commensurate with its polite classical appearance. Course and Moore's article (CA 2020) highlights the unusual relationship of the farm buildings being separated from the farmhouse across Fir Tree Lane and goes on to state that the farm buildings had been '*touched but lightly by Victorian improvements*'.
- 3.14. At that time, Course and Moore (CA 2020) mention that the farmyard was in separate ownership. It was subject to residential conversion in the late 20th century with a defined domestic curtilage to the south and west, and was known as Victoria House. It is understood, however, that the original farm buildings collapsed and were replaced with the Victoria House buildings constructed almost entirely in brick, with

the exception of the main barn which was partly timber clad. Victoria House has now been demolished as part of enabling works for the present scheme.

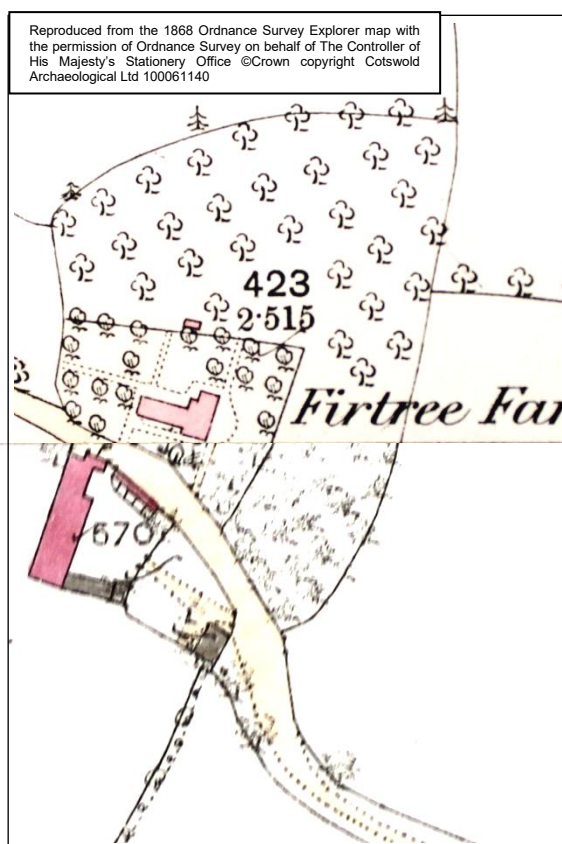


Fig. 4 Fir Tree Farm, extract of 1868 First Edition OS

- 3.15. The surroundings of Fir Tree Farm (Fig.1) have been subject to infrastructure works to create new roadways and a site yard which will serve the One Horton Heath development. The former farmyard, which was rebuilt as a residential dwelling known as Victoria House in the 20th century, has now been demolished.

Significance of Fir Tree Farmhouse

- 3.16. The significance of Fir Tree Farmhouse derives to a substantial degree from the readable multi phased historical construction of the building itself and its adaptation as a refined country house, the quality of its architecture and the internal and external features that remain substantially intact from the 19th century remodelling. It retains both historic illustrative, aesthetic and evidential value as a Grade II Listed Building.

The asset's physical surroundings

- 3.17. The Grade II Listed Building sits within a well-defined garden, with the boundary of the historic garden and orchard legible in the mature hedgerows and trees surrounding the farmhouse on the northern, eastern and western boundaries (Photos

2 and 3). The southern boundary is formed a low wall with hedging to Fir Tree Lane. The access and forecourt are as shown on 19th century maps, with a secondary vehicular access to the west, shown on the early-20th century maps. The surviving spacious garden setting reinforces the understanding of its status as a gentrified farmhouse. The orientation of the principal high-status elevation of the farmhouse to the east also offers information on the intentional design directed away from the farm courtyard and rear working areas over the landscape to the east and to the formerly small settlement of Horton Heath.

- 3.18. The private gardens are predominantly laid to lawn with detached garages, a small former stable, swimming pool with changing block. A tennis court has been constructed in the grounds, in the north-east corner of the former orchard (Photos 4 – 6). To the east of the drive the ground rises to an area of ground enclosed by a low post and rail fence containing an equestrian area with access from Fir Tree Lane (Photo 6).



Photo 2 **Fir Tree Farmhouse seen from Fir Tree Lane**

- 3.19. Whilst the private gardens have become increasingly domesticated with additional modern paraphernalia (such as swimming pool and tennis court), they are still legible as the designated residential grounds of the high-status farmhouse. As such they

provide an historically authentic setting to the Listed Building which is a positive attribute contributing to significance.



Photo 3 Fir Tree Farmhouse seen from within the garden looking south-east



Photo 4 The grounds of the farmhouse looking north

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- 3.20. Fir Tree Lane has provided access to the farmhouse and its related fieldscape since its inception as a farmstead and to and from the local settlements. As such it is a positive attribute of physical setting contributing to an understanding of the function and operation of the farmhouse and its interaction with the local road network, local settlements and the farmyard to the south.



Photo 5 **The grounds of the farmhouse looking north**



Photo 6 **View looking east from the grounds**

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- 3.21. Outside of the well-defined curtilage, the extant field boundaries to the north of Fir Tree Lane date back to at least 1825 Great Allington Enclosure Map and likely represent remnants of the pre-enclosure landscape pattern. The remaining field boundaries to the south of Fir Tree Lane are more regular and of late-19th century date or later. Generally, notwithstanding enabling infrastructure works associated with the outline application, the physical characteristics of the wider surrounding landscape is rural, providing information on the history of the former farmhouse as a working farmstead within an agricultural landscape. This attribute of setting is a positive contributor to significance.
- 3.22. The Listed farmhouse shared a close visual relationship with the former farmyard, rebuilt as Victoria House in the 1980s. Separation of ownership between the farmhouse and farmyard occurred sometime prior to publication of Course and Moore's article in 1984. Victoria House itself was designed to be vaguely reminiscent of a farmstead assemblage through retention of the historic layout and the broadly agricultural style design. Its demolition now means that there is no physical evidence or reminder of the former working buildings of the farmstead. The loss of this attribute of the setting of the Listed Building detracts from its significance.
- 3.23. To the west, a number of more modern farm buildings and a mid-20th century dwelling have been demolished. These represented a 20th century expansion of the agricultural assemblage associated with Fir Tree Farmhouse, but did not make a meaningful contribution to heritage significance through being an element of setting, due to their recent age. At present, given the loss of the western buildings, the farmhouse lies as an enclosed enclave within a wider rural landscape, though the site of the former farm buildings is now used as a development site yard and is not characteristic of the former appearance of this area. This is therefore a discordant attribute of setting.

Experience

- 3.24. The architectural, aesthetic and historic interest of the asset is best experienced from within the private and enclosed garden where there is sense of tranquillity and seclusion provided by the tree and hedge screening to the boundaries. The arrival experience from Fir Tree Lane is a short driveway leading to a turning circle in front of the main east elevation of the house. As an attribute of the experience of the setting of the Listed Building, the experience of arriving to and being within the private garden setting is a positive contributor to significance.

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- 3.25. The wider rural setting of the Listed Building is also, at present, largely experienced as historically (bar the road infrastructure and site compound that has emerged recently). This is to say that the sensory environment of the land surrounding the former farmhouse is natural and pastoral in nature and this is how it was experienced when the farmhouse was in operation. This experience within large parts of the wider setting is also an attribute of setting contributing to significance.
- 3.26. Fir Tree Lane is at present a quiet and 'sleepy' country lane which is not frequently used by cars and other traffic. This experience of the lane is as it was historically experienced and as such its sensory character is a positive attribute of setting contributing to significance.
- 3.27. Views from Fir Tree Lane into the farmhouse grounds allow for glimpses of the Listed Building and are focused on the more informal (south) elevation through the green and wooded boundaries. Otherwise, the main parts of the building are largely screened from view externally (within the wider setting) due to the thick vegetation and trees at the garden boundaries. Only a sense of the building's polite appearance and large gardens can be understood from Fir Tree Lane, largely by virtue of glimpses through the decorative gate and piers (Photo 2) and over the boundary vegetation. It is largely screened at ground level by intervening vegetation. Views from the Listed Building to its setting take in the garden in the main, with first floor longer incidental views throughout the building taking in the wider surrounding rural landscape. These views are partially blocked by mature trees and also change on a seasonal basis.
- 3.28. Although lacking direct ground level inter-visibility with the surrounding rural area, the experience of approaching Fir Tree Farm and other environmental factors allow its relative isolation to be appreciated.
- 3.29. In offering an appreciation of the historic fabric and architectural detailing of the farmhouse, as well as an understanding of its historic illustrative context formed by the surrounding landscapes, these experiences contribute to the significance of the asset. By virtue of the visual and functional relationship to its surrounding rural context, the setting of Fir Tree Farmhouse makes a considerable contribution to the asset's significance as a Grade II Listed Building.

Conclusion on contribution of setting to the significance of the Listed Building

- 3.30. The above assessment has concluded that the following attributes of setting make a positive contribution to the understanding of the significance of the Listed Building:

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- The historic physical layout of the building's grounds with its driveway and garden setting
 - The ongoing access relationship with Fir Tree Lane
 - The historic physical character of the surrounding rural landscape giving evidence of past agricultural interrelationships
 - The sensory experience of being within its enclosed, screened private garden setting
 - The quiet and bucolic country lane experience of Fir Tree Lane
 - The sensory experience of the farmhouse within its wider pastoral rural setting
 - The glimpsed and short views of the farmhouse from within its enclosed and screened garden setting and the tranquil Fir Tree Lane
 - First floor longer range views from the farmhouse over the surrounding rural landscape, which mirror historic views from these windows over the farmhouse's associated landscape

3.31. Recent local infrastructure roadworks and new roadways (as part of outline permissions) have slightly eroded the value of the wider setting attributes to the west. The removal of Victoria House has also been detrimental to significance in that it has removed the last vestiges of evidence of the historic farm layout and farm building interrelationships.

4. ASSESSMENT OF IMPACTS OF NEW DEVELOPMENT

Introduction

- 4.1. As a Grade II Listed Building, Fir Tree Farmhouse will be particularly sensitive to development within its setting. The Heritage Chapter¹ of the Environmental Statement for the Outline Application found that the proposed residential development of Quobleigh Breach has potential to bring adverse impacts to the significance of Fir Tree Farmhouse as a result of the proposals. It details that, with mitigation, the effects are not likely to be substantial and were considered to be less than substantial. Mitigation was recommended as follows:

- Retention of the key aspects of the immediate garden setting of the farmhouse
- Limited intervisibility through current and enhanced tree and vegetation screening would retain the experience of privacy and seclusion and could be enhanced by consideration of a green buffer zone around the garden enclosure to the north and east
- Within the grounds, reinstatement of orchard planting and other historic features could assist screening measures and provide historic references to enhance experience of the immediate setting

The Proposals

- 4.2. The proposals comprise the construction of 269 new residential units with associated car parks, access roads and landscaping to the east, south and north of Fir Tree Farmhouse. The farmhouse site is not included within the site boundary and there are no proposed physical changes to the building itself.
- 4.3. Within the proposals Fir Tree Lane is to become a bridleway, and vehicular access to the site is to be achieved through a new road access from the north. Landscaping plans extend only to the boundaries of the garden and include a wide verge wildflower meadow to the new northern access road plus additional green verges to Fir Tree Lane.
- 4.4. Landscaping plans show no additional screening vegetation is to be implemented to the boundaries of the garden on the east, west and north. The extant hedging and boundary vegetation comprise what appears to be leylandii to the western boundary, with mixed hedging interspersed by mature trees. The enclosure screening is already

¹ <https://planning.eastleigh.gov.uk/s/public-register>

'solid' through the extant vegetation, though at the site visit was not observed to be particularly tall in height.

- 4.5. The effects of the proposal are considered in the context of the wider One Horton Heath outline planning permission, which includes further residential parcel (known as The Holme and Homestal) to the east of the Listed Building (this is subject to a separate reserved matters application). As a result, Fir Tree Farm will be effectively encircled by new residential housing on all sides, beyond the immediate garden/grounds.

Assessment of impacts

- 4.6. Paragraph 3.30 in Section 3 above provides a summary of what matters and why to the significance of the Listed Building in terms of its setting. This concludes that its enclosed garden setting makes the most meaningful contribution to significance, but that the experience and views of the wider rural area currently surrounding the building do make a contribution to its historic illustrative interest as a former farmhouse and to the understanding of that interest.
- 4.7. The proposals will bring about an acute change to the experience and physical character of the wider environs of the south, west and north from a rural fieldscape to a developed suburban neighbourhood. Combined with the development consented in outline to the east, the farmhouse will become encircled by a new residential settlement and with no surviving agricultural land within its setting. This will erode the understanding of the Listed Building as a standalone farmhouse within its associated agrarian environment (which at present is a positive attribute of setting contributing to significance). This loss will bring harm to its significance through severely limiting the ability to understand or appreciate its historic physical and functional setting and the associated experience of the asset within this setting.
- 4.8. The present primary arrival into the grounds of the Listed Building is through a gateway off Fir Tree Lane. Whilst this arrival area will still be extant, it will only be accessible to walkers and cyclists. The installation of the access drive to the north of the site means that the historic experience of arriving at the principal east elevation of the house will be lost, alongside the features such as gateposts and the turning circle, which form part of the current arrival experience and which offer interpretation of the historic way this site was accessed. This loss of the historic arrival experience has a minor but appreciable effect on historic illustrative value.

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- 4.9. The most significant way in which the understanding and experience of the farmhouse (and therefore its significance) will be affected is through the impacts on views from the farmhouse, both at ground level and on the upper floors. The physical presence of the buildings and infrastructure of the new settlement will be visible as glimpses through and over the boundary vegetation of the garden to the north where the new access road will be located, and at first floor level in views from the upper windows. The upper storeys of the new dwellings adjacent to the west and north of the Fir Tree site will be visible over and above the extant hedging to these sides, and also to the south, where they will interact with Fir Tree Lane (and where there is more limited screening through low walls and hedging). In addition, street lighting and human/vehicular activity within the new settlement will also change the sensory experience of being within the grounds of the Listed Building, which are at present enclosed and tranquil, with dark skies at night.
- 4.10. Therefore the new settlement will be visible as part of the Listed Building's setting in views, which will negatively affect how it is experienced and how its significance is understood. Both the erosion of the historic physical and functional character of its extant setting, and the loss of authentic sensory experience of the Listed Building in its historic setting brings harm to historic illustrative value. When considered in the context of the outline permission, and development to the east of the Listed Building (for which a separate reserved matters application will be forthcoming), the overall effect would be less than substantial harm, such that the Listed Building's significance is reduced but still appreciable and a degree its heritage significance would remain, embodied within its physical fabric, appearance, and its enclosed garden grounds.

Mitigation of effects (Step 4 – Settings Assessment)

- 4.11. Fir Tree Farmhouse's spacious enclosed garden is to be retained as part of the proposals. The settings assessment found that the private garden grounds of the building, as an entity, are a positive attribute of setting which provides interpretation and understanding of the building as a high-status farmhouse. The retention of the garden largely without alteration (the only change being the new access drive into it) is a positive element of the scheme which helps preserve significance. Proposals for the long term use of Fir Tree Farmhouse will form part of a separate, future Reserved Matters application. The property and its grounds are identified for mixed-use development in the Parameter Plans for the Outline Planning Application.

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- 4.12. The proposals do not include any additional tree planting or screening of the new development as mitigation measures around the boundaries of the Listed Building's garden. The extant screening is relatively thick medium height vegetation punctuated by mature trees, but some vegetation will be cleared to make way for the access road. As outlined in paragraph 4.7 above this will result in the new development being partially visible from the Listed Building (both at ground and first floor level) and therefore having a negative effect on its experience. This said, it is not anticipated that additional tree planting would offset the harm to the significance of the Listed Building which arises overall as a result of the new development and its change to the physical characteristics of the surroundings.
- 4.13. As part of the scheme, Fir Tree Lane is to be kept as a bridleway and public pathway which will be augmented with grass verges and additional tree planting to its southern verge. This will mean that the laneway will retain its tranquil, verdant quality which has been found to be a positive attribute of the setting of the Listed Building. This a positive mitigating feature of the design, though it is not considered to offset the overall harmful effect of the new settlement on the significance of the Listed Building.

Summary of effects

- 4.14. As predicted within the ES documentation for the wider site, the proposed Quobleigh Breach scheme will irreversibly alter the physical and experiential setting of the Listed Building in a way which would adversely affect its special interest. The level of effect is found to be less than substantial such that its significance is reduced but still appreciable. As per paragraph 215 of the NPPF 2024, the harm found as a result of the proposals on the significance of Fir Tree Farmhouse should be placed in the planning balance against the public benefits of the scheme.

5. CONCLUSIONS

- 5.1. This assessment has examined the effects the Reserved Matters planning application for the residential parcel known as 'Quobleigh Breach' on the significance of Fir Tree Farmhouse, a Grade II Listed Building which lies adjacent to the development site. The Quobleigh Breach Reserved Matters Application, part of a wider One Horton Heath masterplan, is for the erection of 269 new residential units with associated car parks, access roads and landscaping. The wider scheme, known as One Horton Heath, was granted Outline Planning Permission in October 2025 (ref. O/20/89498).
- 5.2. The application boundary, which does not include the Listed Building or its garden, comprises agricultural land either side of Fir Tree Lane and the recently constructed new north-south link road, vegetation along the boundaries, SUDS and pumping station (built in association with the link road) and a construction compound on site of the modern farm buildings immediately to the west of the Fir Tree Farmhouse.
- 5.3. Fir Tree Farmhouse was built in the 18th century and comprises a polite high status country house formerly associated with a courtyard farmstead to the south which was demolished in the 20th century. It was historically located within an associated fieldscape of agricultural character, and it now lies within a spacious enclosed garden.
- 5.4. A settings assessment has been undertaken to understand what matters and why to the significance of the Listed Building in terms of its setting. This found that setting made a meaningful contribution to its significance, positive attributes being the wider rural landscape surrounding it and its immediate garden grounds which allows for the best appreciation and experience of the aesthetic value of the Listed Building.
- 5.5. An assessment of effects has found that the proposed scheme will bring substantial change to the physical character and experience of the wider setting of the Listed Building. This change will erode the understanding and appreciation of the Listed Building as a farmhouse within a rural landscape and thus its historic illustrative interest. The level of effect is found to be less than substantial such that its significance is reduced but still appreciable. As per paragraph 215 of the NPPF 2024, the harm found as a result of the proposals to the significance of Fir Tree Farmhouse should be placed in the planning balance against the public benefits of the scheme.

6. REFERENCES

Cotswold Archaeology 2020 *Land at Horton Heath, Eastleigh, Hampshire Heritage Desk-Based Assessment*

Cotswold Archaeology 2020a *Heritage Chapter: Environmental Impact Assessment*

Cotswold Archaeology 2025 *Archaeological Desk Based Assessment*

CGMS 2018 *Built Heritage Assessment Fir Tree Farmhouse*

Historic England 2008 *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

Historic England 2015 *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment*

Historic England 2017 *Historic Environment Good Practice Advice in Planning: Note 3: The Setting of Heritage Assets (Second Edition)*

Historic England 2019 *Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets*

Historic England 2024 *National Heritage List for England* <https://historicengland.org.uk/listing/the-list/>

Ministry for Housing, Communities and Local Government 2024 *National Planning Policy Framework (NPPF)*; published December 2024

Planning (Listed Buildings and Conservation Areas) Act 1990 Act of UK Parliament

APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute: Listed Buildings

Listed buildings are buildings of ‘special architectural or historic interest’ and are subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 (‘the Act’). Under Section 7 of the Act ‘no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.’ Such works are authorised under Listed Building Consent. Under Section 66 of the Act ‘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, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses’.

Note on the extent of a Listed Building

Under Section 1(5) of the Act, a structure may be deemed part of a Listed Building if it is:

- (a) fixed to the building, or
- (b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948

The inclusion of a structure deemed to be within the ‘curtilage’ of a building thus means that it is subject to the same statutory controls as the principal Listed Building. Inclusion within this duty is not, however, an automatic indicator of ‘heritage significance’ both as defined within the NPPF (2024) and within Conservation Principles (see Section 2 above). In such cases, the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed Building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the ‘Listed Building’ (to include the building in the list and all the ancillary items) where they affect the special character of the Listed building as a whole.

Guidance is provided by Historic England on ‘Listed Buildings and Curtilage: Historic England Advice Note 10’ (Historic England 2018).

National heritage policy: the National Planning Policy Framework

Heritage assets and heritage significance

Heritage assets comprise ‘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' (the NPPF (2024), Annex 2). Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas (designated under the relevant legislation; NPPF (2024), Annex 2). The NPPF (2024), Annex 2, states that the significance of a heritage asset may be archaeological, architectural, artistic or historic. Historic England's 'Conservation Principles' looks at significance as a series of 'values' which include 'evidential', 'historical', 'aesthetic' and 'communal'.

The setting of heritage assets

The 'setting' of a heritage asset comprises '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' (NPPF (2024), Annex 2). Thus it is important to note that 'setting' is not a heritage asset: it may contribute to the value of a heritage asset.

Guidance on assessing the effects of change upon the setting and significance of heritage assets is provided in 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets', which has been utilised for the present assessment (see below).

Levels of information to support planning applications

Paragraph 207 of the NPPF (2024) identifies that 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.

Designated heritage assets

Paragraph 202 of the NPPF (2024) explains that heritage assets 'are an irreplaceable resource and should be conserved in a manner appropriate to their significance'. Paragraph 212 notes that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 213 goes on to note that 'substantial harm to or loss of a grade II listed building...should be exceptional and substantial harm to or loss of designated heritage assets of the highest significance (notably scheduled monuments, protected wreck sites,

registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites)...should be wholly exceptional’.

Paragraph 215 clarifies 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, where appropriate, securing its optimum viable use’.

Development Plan

Current local planning policy within Eastleigh Borough is guided by the Local Plan (2016-2036), which was adopted in April 2022. Those of relevance to heritage include:

Strategic Policy 8: Historic Environment

The Borough Council will continue to conserve and/or enhance the Boroughs heritage assets in a manner appropriate to their significance. This includes all heritage assets including listed buildings and structures, Conservation Areas as designated on the policies map, landscapes and archaeology. This will be through the preparation of Conservation Area Appraisals and Management Plans and other strategies and in the determination of planning applications for new development (see policy DM12). This will involve:

- a. identifying the assets by means of an on-going programme of survey and review;
- b. identifying their key features and measures to manage and enhance these, e.g. through Conservation Area Appraisals;
- c. restricting development likely to harm them or their settings through management of development proposals; and
- d. encouraging development that enhances them, ensures their long-term management and maintenance and where possible, enables public enjoyment and the interpretation of the asset.

Policy DM12, Heritage Assets:

Development of a heritage asset or within their setting will be permitted provided:

- i. it does not harm or detract from the significance or special interest of the asset, and sustains and enhances its special character and qualities. The more important the asset, the greater the weight that should be accorded to this criterion. Permission for development which results in substantial harm to, or loss of, designated assets of the highest significance will be exceptional. Development which involves the demolition or

destruction of any part of other heritage assets will not be permitted unless its removal or replacement would enhance or better reveal the significance of the asset. In these circumstances, the developer will be required to record and advance understanding of the significance of any heritage assets to be lost, in a manner appropriate to their importance and the impact, and to make this evidence publicly accessible. Development that affects an archaeological site either above or below ground that is already identified or discovered through development proposals will only be permitted provided:

- a. if the remains cannot be preserved in situ, the clear and convincing overriding public benefits of the development that cannot be achieved by any other means is sufficient to outweigh the value of the remains; and
- b. prior to the commencement of the development, provision has been made for a programme of archaeological investigation and recording and for this evidence to be made publicly accessible;
- ii. it achieves a high standard of design which respects and complements the character and qualities of the heritage asset(s);
- iii. where necessary, it secures the long-term future maintenance and management of the asset;
- iv. where possible, it enables public enjoyment and interpretation of the asset; and
- v. a heritage statement is submitted with the application explaining the significance of the assets affected including the contribution made by their setting, at a level of detail proportionate to the asset's significance; the impact of the proposal on the significance of the asset; and how proposals have been developed to avoid harm or, if this is not possible, minimise the harm; with mitigation measures proposed.

In permitting development involving a heritage asset the Borough Council may seek a legal agreement to secure the long-term management and enhancement of the asset

Good Practice Advice 1-3

Historic England has issued three Good Practice Advice notes ('GPA1-3') which support the NPPF. The GPAs note that they do not constitute a statement of Government policy, nor do they seek to prescribe a single methodology: their purpose is to assist local authorities, planners, heritage consultants, and other stakeholders in the implementation of policy set out

in the NPPF. This report has been produced in the context of this advice, particularly ‘GPA2 – Managing Significance in Decision-Taking in the Historic Environment’ and ‘GPA3 – The Setting of Heritage Assets’.

GPA2 - Managing Significance in Decision-Taking in the Historic Environment

GPA2 sets out the requirement for assessing ‘heritage significance’ as part of the application process. Paragraph 8 notes ‘understanding the nature of the significance is important to understanding the need for and best means of conservation.’ This includes assessing the extent and level of significance, including the contribution made by its ‘setting’ (see GPA3 below). GPA2 notes that ‘a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so’ (Page 3).

GPA3 – The Setting of Heritage Assets

The NPPF (Annex 2: Glossary) defines the setting of a heritage asset as ‘the surroundings in which a heritage asset is experienced...’. Step 1 of the settings assessment requires heritage assets which may be affected by development to be identified. Historic England notes that for the purposes of Step 1 this process will comprise heritage assets ‘where that experience is capable of being affected by a proposed development (in any way)...’.

Step 2 of the settings process ‘assess[es] the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated’, with regard to its physical surrounds; relationship with its surroundings and patterns of use; experiential effects such as noises or smells; and the way views allow the significance of the asset to be appreciated. Step 3 requires ‘assessing the effect of the proposed development on the significance of the asset(s)’ – specifically to ‘assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it’, with regard to the location and siting of the development, its form and appearance, its permanence, and wider effects.

Step 4 of GPA3 provides commentary on ‘ways to maximise enhancement and avoid or minimise harm’. It notes (Paragraph 37) that ‘Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development liable to affect its setting are considered from the project’s inception.’ It goes on to note (Paragraph 39) that ‘good design may reduce or remove the harm, or provide enhancement’.

Heritage significance

Discussion of heritage significance within this assessment report makes reference to several key documents. With regard to Listed buildings and Conservation Areas it primarily discusses ‘architectural and historic interest’, which comprises the special interest for which they are designated.

The NPPF provides a definition of ‘significance’ for heritage policy (Annex 2). This states that heritage significance comprises ‘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’. This also clarifies that for World Heritage Sites ‘the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance’.

Regarding ‘levels’ of significance the NPPF (2024) provides a distinction between: designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.

Historic England’s ‘Conservation Principles’ expresses ‘heritage significance’ as comprising a combination of one or more of: evidential value; historical value; aesthetic value; and communal value:

- Evidential value – the elements of a historic asset that can provide evidence about past human activity, including physical remains, historic fabric, documentary/pictorial records. This evidence can provide information on the origin of the asset, what it was used for, and how it changed over time.
- Historical value (illustrative) – how a historic asset may illustrate its past life, including changing uses of the asset over time.
- Historical value (associative) – how a historic asset may be associated with a notable family, person, event, or moment, including changing uses of the asset over time.
- Aesthetic value – the way in which people draw sensory and intellectual stimulation from a historic asset. This may include its form, external appearance, and its setting, and may change over time.
- Communal value – the meaning of a historic asset to the people who relate to it. This may be a collective experience, or a memory, and can be commemorative or symbolic to individuals or groups, such as memorable events, attitudes, and periods of history. This includes social values, which relates to the role of the historic asset as a place of social interactive, distinctiveness, coherence, economic, or spiritual / religious value.

Effects upon heritage assets

Heritage benefit

The NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit. Paragraph 219 of the NPPF (2024) notes that ‘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 the asset (or which better reveal its significance) should be treated favourably’.

GPA3 notes that ‘good design may reduce or remove the harm, or provide enhancement’ (Paragraph 28). Historic England’s ‘Conservation Principles’ states that ‘Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced’ (Paragraph 84).

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in Conservation Principles.

Heritage harm to designated heritage assets

The NPPF (2024) does not define what constitutes ‘substantial harm’. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in *Bedford Borough Council v SoS for CLG and Nuon UK Ltd*. Paragraph 25 clarifies that, with regard to ‘substantial harm’: ‘Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced’.

Effects upon non-designated heritage assets

The NPPF (2024) paragraph 216 guides that ‘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 judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

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