

On Instructions from

Heritage Statement

for

An Outline Planning Application for the erection of up to 8 dwellings (2 affordable) and associated works

(All matters reserved save for access)

Stamages Lane, Painswick, GL6 6UX

BK Reference:

512251

December 2018



Contact Details

Prepared by: Bruton Knowles

Olympus House,

Olympus Park,

Quedgeley,

Gloucester,

GL2 4NF

BK Contacts: T:

Planner E: @brutonknowles.co.uk

T:

Associate Planner E: @brutonknowles.co.uk

Prepared for:

Date: December 2018

Version: 1



CONTENTS

		Page No.
1.	Introduction	1
2.	The Site and Surroundings	2
3.	Proposed Development	4
4.	Planning Policy Framework	5
5.	Material Considerations	7
6.	Historic Environment Record	8
7.	Appraisal	13
8.	Conclusion	23

1. INTRODUCTION

- 1.1 This Heritage Statement has been prepared by Bruton Knowles on behalf of to accompany an Outline Planning Application for the erection of up to 8 dwellings (2 affordable) and associated development at Stamages Lane, Painswick. This report accompanies the Outline Planning Application.
- 1.2 The statement has been requested due to the application site's proximity to Painswick's Conservation Area and other listed buildings in the village. The Gloucestershire Historic Environment Record was reviewed as part of this assessment.

2. THE SITE AND SURROUNDINGS

- 2.1 Painswick is situated on a hill in Stroud District Council's administrative area and is located circa 3 miles north of Stroud and 6 miles south east of Gloucester. Originally the town grew on the wool trade, but it is now best known for its parish church's yew trees and the local Rococo Garden. The village is mainly constructed of locally quarried Cotswold stone. Many of the buildings feature south-facing attic rooms once used as weavers' workshops. There is evidence of Iron Age settlements, as seen in the defensive earthworks at nearby Painswick Beacon, which has wide views across the Severn Vale.
- 2.2 The application site has been overlaid on Stroud District Local Plan Policies Map below, to demonstrate its proximity to both the conservation area and other heritage assets. The site is circa 0.8 hectares in size.



Site outlined red; conservation area outlined in green and listed buildings contained in yellow fill on aerial photograph (For indicative purposes only)

- 2.3 The distance to the boundary of the conservation area is circa 60 metres to the north east of the nearest proposed dwelling (plot 5). The conservation area is defined by its use of Cotswold Stone; number of parish churches, open spacious plots; density of trees and listed buildings recognised by their use of limestone and stone slate roofs.
- 2.4 The closest listed buildings are circa 80 metres to the south east of the nearest proposed dwelling (plot 4). These listings are referred to as Knapp Cottage and Knapp Orchard House.

- 2.5 The heritage list describes Knapp Cottage as a grade II listed C17 house alongside the road which has had C20 modifications. Key features include coursed limestone blocks and stone slate.
- 2.6 The heritage list describes Knapp Orchard House as a grade II listed building which was attached to an earlier cottage in 1926 by Detmar Blow. It also consists of squared limestone and a stone slate roof.
- 2.7 Castle Hale also grade II listed is the only other designated heritage asset located in close vicinity to the application site (circa 100 metres away from plot 5), which includes a detached house in the grounds that dates back to the C17, C18 and C20 that consists of limestone ashlar or coursed worker and a stone slate roof to early block and Welsh slate later.
- 2.8 St. Mary's Church is grade I listed and is located circa 230 metres to the north of the site's boundary. It provides a notable feature in Painswick, however the site is not visible from the church's grounds.
- 2.9 For further information on these heritage assets please refer to section 6 (Historic Environment Record).

3. PROPOSED DEVELOPMENT

- 3.1 The proposal is for the erection of up to 8 dwellings and associated development. The proposed development will provide a low density scheme that will be sympathetic to the existing character of the village.
- 3.2 The following dwellings are proposed in the outline application (numbers will be secured at reserved matters but will be no more than 8).

Plot	Bed/Type	GIA	Parking
1	5B Detached	200 sqm	4 spaces
2	5B Detached	200 sqm	4 spaces
3	5B Detached	200 sqm	4 spaces
4	5B Detached	200 sqm	4 spaces
5	5B Detached	200 sqm	4 spaces
6	5B Detached	200 sqm	4 spaces
7	3B Detached	83 sqm	2 spaces
8	3B Detached	83 sqm	2 spaces

4. PLANNING POLICY FRAMEWORK

4.1 RELEVANT HERITAGE DEVELOPMENT PLAN POLICY

- 4.2 Stroud District Local Plan was adopted in November 2015. The following Local Plan policies are considered relevant to this Heritage Statement.
- 4.3 ES7- Landscape Character sets out that land which may affect the historic setting and cultural heritage of an area should conserve or enhance the special features and diversity of the different landscape character types.

It goes onto state that development will only be permitted if all the following criteria are met:

- 1. The location, materials, scale and use are sympathetic and complement the landscape character and;
- 2. Natural features including trees, hedgerows and water features that contribute to the landscape character and setting of the development should be both retained and managed appropriately in the future.
- 4.4 It is considered the scheme does not affect the setting of any historical assets, however the scheme's layout and design have been selected so that they are in keeping with the character of the area. Plots will be spacious and the appearance of the dwellings will reflect the Cotswold stone buildings which surround the site. The appearance and design will be secured at reserved matters.
- 4.5 Natural features will be retained and enhanced to increase the site's biodiversity. This will include the retention and planting of new trees and hedgerow. Details are set out in the supporting landscape appraisal.
- 4.6 ES10- Valuing our historic environment and assets sets out that: Stroud District's historic environment will be preserved, protected or enhanced, in accordance with the principles set out below:
 - 1. Any proposals involving a historic asset shall require a description of the heritage assets significance including any contribution made by its setting, and an assessment of the potential impact of the proposal on that significance, using appropriate expertise. This can be a desk based assessment and a field evaluation prior to determination where necessary and should include the Gloucestershire Historic Environment Record.

- 2. Proposals and initiatives will be supported which conserve and, where appropriate, enhance the heritage significance and setting of the Districts heritage assets, especially those elements which contribute to the distinct identity of the District.
- 3. Proposals will be supported which protect and, where appropriate, enhance the heritage significance and setting of locally identified heritage assets, such as buildings of local architectural or historic interest, locally important archaeological sites and parks and gardens of local interest.
- 4. Proposals will be supported that protect and, where appropriate, enhance key views and vistas, especially of the spires and towers of historic churches and mills.
- 5. Any harm or loss would require clear and convincing justification to the relevant decision-maker as to why the heritage interest should be overridden. A full programme of work shall be submitted with the application, together with proposals to mitigate any adverse impact of the proposed development, and where appropriate, be implemented through measures secured by planning condition(s) or through a legal agreement.
- 4.7 A description of the significance of surrounding heritage assets is set out in section 6 (Historic Environment Record) and in paragraphs 2.6 to 2.9.
- 4.8 An assessment of the potential impacts of the development is set out in section 7 (Appraisal). The level of detail provided in this statement is appropriate given its proximity to Painswick's conservation area and the nearest listed buildings which are not adjacent to the site.

5. MATERIAL CONSIDERATIONS

- 5.1 <u>The National Planning Policy Framework (NPPF)</u>
- 5.2 Paragraphs 193-202 of the NPPF describe how to deal with applications which may have impacts on heritage assets. It is considered that the proposal will lead to less than substantial harm (indeed there should be some positive impacts by virtue of the proposal) for the purposes of paragraph 193, which states:

"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."

- 5.3 In this instance the public benefit is to provide well designed houses in a location which is within the settlement boundary and is an acknowledged sustainable location. In addition the proposal will provide much needed affordable housing to comply with adopted policies.
- 5.4 It should be considered that there is a sufficient buffer between the application site and surrounding designated heritage assets (see paragraphs 7.9 to 7.28) and the proximity and distance mean that the proposed development preserves the conservation area and other heritage assets.

6. HISTORIC ENVIRONMENT RECORD

6.1 The Gloucestershire Historic Environment recorded the following assets within 100 metres of the application site, which includes sites in addition to the listed buildings discussed above:

HER: Address & Description:

3613 Castle 12th century (site of), Painswick

A small castle constructed by Pain Fitzjohn in C12. Formerly stood on the SMR occupied by Castle Hale. It was demolished towards end C16, when the Court House (SMR 3606) was built. There are neither visible remains of a castle nor indications as to the exact nature of the fortifications.

Castle or hall on the site, called Castle Hall or Hale from the C16, to the south of the church and commanding the southern approach to the town.

There are no visible remains. Probable site, exact location unknown.

1994 - A watching brief on the excavation of foundation trenches for a large extension produced a pit of at least 2m x 2m x 1m in plan backfilled by charcoaly silt and redeposited yellow gravel in the south west corner of the study area. In the north east corner of the new breakfast room a shallow ditch 1.1m deep by 3m wide with a 'U' profile was also located. There were no finds or dating evidence in any of the sections or excavated material.

A plan recorded in the HER as being in the DC file could not be located.

19520 Castle Hale (formerly listed under Hale Lane) - II 21/10/55

Detached house in grounds. C17, C18 and C20. Limestone ashlar or coursed worker, stone slate roof to early block and Welsh slate to later.



Front view of Castle Hale

A U-plan C17 house to which a large C18 block was grafted on the garden side; this modified in the C20. The early block has, towards the court House (qv) 2 storeys and attic with two saddle-back coped gables each with 2 over 3-light recessed chamfer mullioned casements with stopped hoods and a central C20 oculus; at ground floor is a C20 door with hood, three C20 single lights, and, to left a deep C17 stone lintel over a moulded surround with glazed door.

To left return the block forms a tight 'U' plan, but attached to the later building. The coped east gate has a fine carved rebus, then, south facing is a cross gable with 2 over 2+ 2-light mullioned casements with hoods, and at ground floor a 3-light plus a blocked door under stepped hood. The recessed unit is 3 storeys and attic with two small coped gables in a parapet, 2 and 3-light casements; to left a good early oculus in decorated square surround over a 3-light hollow-chamfer mullioned casement, and later lights under a continuous string, with C20 projecting porch, right. The garden front of the C18 block is 2 storeys, 2:1:2-windowed plate glass porches but central. Venetian first floor in pediment stepped forward unit over a 4-columned Roman Doric portico with responds, covering a glazed door with side lights this front has plat band and cornice with parapet. One bay return to right.

To the left side is dated 1939, with octagonal single storey bays continuous frieze, moulded cornice, parapet and coping. Venetian window under open pediment under balustrade, two windows left, French door to bay roof, right. A house with long history and complex growth. Interior not inspected. (St Claire Baddeley, History of Painswick, 1929).

1152559 Knapp Cottage/ Painswick Knapp Lane (east side)

Knapp Cottage (formerly listed as Knap Orchard House) GV II House alongside the road. C17 with C20 modifications. Large squared and coursed limestone blocks, stone slate roof. A cross-gabled cottage to which a lower wing is added left, and a C20 stair turret in half-cylindrical turret at the back, probably by Detmar Blow, as part of the modifications made when the attached Knap Orchard House (qv) was built in 1926. Two storeys and attic, with gable, left, to street with 2-light recessed chamfer casements at 3 levels, under stopped hoods; to the right are two single lights, also with hoods. To the left, in lower unit are 1:3: door: 2-light under a stepped hood mould; plank door. Right gabled return, towards the valley, has 2 over 3 over 3-light recessed chamfer mullioned casements with hoods, and garden front has a 2-light lancet over 2 over 3-light casements in gable, with a quadrant connection to the later house. Interior not inspected.

1090980 Knap Orchard House, Knap Lane

Knap Orchard House GV II House, attached to earlier cottage. 1926 by Detmar Blow. Squared limestone, stone slate roof. An L-plan plus projecting wing. The main garden front is 2 storeys and attic with 3 gables; ground floor has recessed chamfer stone mullioned casements grouped 2:2 the 2:2:2 then 2:2:2 light with plank door in square moulded surround between bays one and two, all these under a continuous string. At first floor each gable has paired casements, under small single lancets in the upper levels, also a single paired casement over the door. The right return has a gable with oculus over a 2:2:2-light casement; beyond this a projection with a 4-light metal casement over a small yard. The entrance arch has a single gable has similar fenestration to garden front, with 2:2-light casement over a large plank door, left, then 2:2:2-light below the gable. The right return has two gables with single lancets over paired casements at ground and first floors and a blocked 2-light; to the right is a small quadrant wall with 2 lancets. Each wing has a large ridge stack in ashlar. The interior has the original panelling in stair hall and in two ground floor rooms en-suite; also two good fireplaces in traditional design, one with 'Jacobean' over mantel and the date 1926. Stair has splat balusters. There is a connection to Knapp Cottage (qv) through a door disguised as a bookcase: the cottage is assumed to have been a service wing to the new house. A very assured and careful study by the architect, who lived in the adjoining parish and undertook considerable work in Painswick, but this is unusually a complete new building by him.

1090990 Church of St Mary

Church of St Mary 21.10.55 is a GV I Anglican parish church. Late C14, nave c.1480, C15 tower, restoration 1883 by Waller, including rebuilt south aisle arcade, porch 1968. Dressed squared Painswick stone, stone slate roofs, lead to aisles. Nave with aisles, chancel, north and south chancel chapels, vestry, south porch, west tower with spire. Three-stage tower with diagonal buttresses to 6 offsets and plinth, to crenelated parapet and octagonal spire with roll-mould arises; moulded strings to stages. West front has small plank door in segmental head, under 3-light Perpendicular window, a cusped lancet, and a 2-light belfry opening with louvres. North front has similar belfry opening above clock face in square surround set diagonally; plank door up step to belfry stair. South front has a baroque wall monument, cusped lancet and 2-light belfry opening. South aisle has 2-light with transom to the west, and 4 similar to south, all late C19 'Perpendicular' to string course, blocking and plain parapet. No clerestory to nave. Canted south porch of 1968. Vestry of 1890 has 5-light south and 2-light east window, and door to south side with gabled canopy on brackets. Sanctuary has diagonal buttresses, 2-light windows north and south, 3-light to east, coped gable; also coped gable to chancel east end. East end of St Peter's chapel has 4-light, and north side two 2-light, coped gable, diagonal buttress. North aisle in 5 bays with 2-light Perpendicular windows separated by shallow buttresses, that to bay 4 set above pair of C19 doors to pointed arch with drip. Wet end blank. Plinth, parapet string, blocking and moulded capping, gargoyles. No clerestory to nave. Interior: 5 bay nave arcade with octagonal shafts to mannerist divided capitals and 4-centred arches; that to south aisle a late C19 rebuilding; no clerestory. Flat 4-centred arched Cl9 timber roof in 6 bays. Double chamfered chancel arch; to tower an inscription to top of 'dado' rail at 2 m, and fine screen as memorial to Edwin Gyde, 1901 with gilded eagle of 1722; screen white and black veined marble in Renaissance style. Tower arch fitted panelling and y-tracery. North aisle continues as St Peter's Chapel at east end; aisle has door opposite south entry, in bay 2 from west; arch-braced single slope roof, 3 windows with early C20 glass, by Powell. Four carved corbel heads and one blocked but unworked, on north wall. St Peter's chapel, probably of 1377 build has two 2-light C14 style windows and 4-light to east, arch-braced rafter roof with one moulded tie-beam. Two bays open to chancel, in detail as nave arcade; C20 screens by Ellis Mars land as 1918 memorial, good Perpendicular detail. On the north side a C15 Purbeck marble tomb. Tudor canopy including fan vault carved from solid alabaster effigies of early C7 moved here in C18,

when central Corinthian column inserted as vault support. Squint to nave. South aisle has 4-bay flat C19 ceiling, braced with 'fret- work'. Windows by Geoffrey Webb, mid C20 and a heraldic window by Francis Sleat, 1960. Chapel at east end, now used as vestry, extended to the south. East window is 2 x 2-light C15 form over a splendid stone reredos with fluted Ionic columns and broken pediment with decalogue: screen by John Bryan is 1743. Bryan was the 'carver' employed on some of the fine churchyard monuments. Chancel is one bay, extended into Sanctuary which formerly was the Lady Chapel. Faceted C19 panelled ceiling. Cusped piscina to south; 3 part rere- dos. Tiled floors, generally, raised timber panels to pew areas. Fittings and monuments: standing near to pulpit, remaining section of C14 spire. Pews of C20. Rood 193. Snelzler of 1770 brought here in 1818. Royal Arms, William IV. Various white marble monuments in tower; south aisle includes good baroque cartouche to John Webb, 1712; in north aisle a model of the Bonaventura of 1885, good carved C17 slab under first window from west, also Ann Berriman, 1738. South chapel includes 6 good wall monuments, including Revd George D of 1686. Church was originally owned by Llanthony Priory, Gloucester; nothing of the C12 church remains. Major problems have been involved because the spire was struck by lightning in 1763 and 1883; also the south aisle, rebuilt in a classical mode in 1741 was replaced again in Gothic in 1883.

6.2 <u>ARCHAEOLOGY</u>

- 6.3 Pre-application discussions did not require the submission of any archaeological reports.
- 6.4 Information from PastScape illustrates that the following monuments are located within 100 metres of the site:

Monument Number: 114879- Medieval Castle (1066-1540);

Monument Number: 114879- Medieval Cellar (1066-1540).

7. APPRAISAL

- 7.1 <u>ASSESSMENT OF THE SIGNIFICANCE OF THE HERITAGE ASSETS:</u>
- 7.2 Painswick's Conservation Area
- 7.3 The primary drivers for this Heritage Statement are: the village's Conservation Area and surrounding listed buildings.
- 7.4 The village's conservation Area was first designated in December 1977 and was extended in June 1990. It is defined by its use of Cotswold Stone; number of parish churches; open spacious plots; density of trees and listed buildings recognised by their use of limestone and stone slate roofs.
- 7.5 As can be seen by comparing the historic aerial map (1945) of the village and a map of the current village (2018), it is apparent how much modern development has taken place in and adjacent to the conservation Area.
- 7.6 It is also apparent that there is also some form of development in the north east corner of the application site which is no longer present.



Site outlined in red (For indicative purposes only)

7.7 It is considered that development to the east of the application site between 1945 and 2018 has resulted in the site becoming isolated as it is now surrounded by uses on all four sides. The site is now effectively an infill plot which is contained within Painswick's development boundary.

7.8 The significance of surrounding grade II listed buildings are set out in section 6 (Historic Environment Record) and are mapped out below for ease of reference.

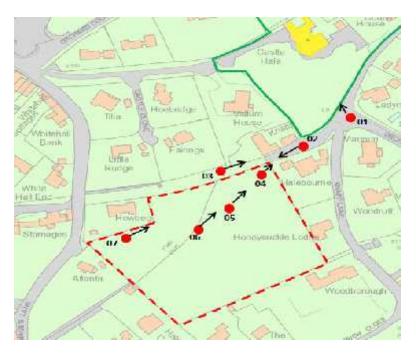


7.9 <u>ASSESSMENT OF IMPACT</u>

7.10 The special qualities of what makes the heritage assets distinct have been identified above. It is considered that the notable architecture of surrounding grade II/I listed buildings, which feature in and adjacent to the conservation area, will not be in impacted upon, by virtue of distance and intervening features from application site, nor will the buildings historic interest for the same reasons. Features and views from each heritage asset are assessed below:

7.11 View from the Castle Hale and the Conservation Area

7.12 As set out below the boundary to the conservation area is circa 60 metres and Castle Hale circa 100 metres to the north east of the nearest proposed dwelling (plot 5). Views from various vantage points towards and from Castle Hale, the conservation area and site are assessed below:



Map of vantage points: Castle Hale set out in yellow fill, site boundary in red dash and conservation area in green line

7.13 View Point 1: Views into the conservation area and towards Castle Hale are severely restricted from Knapp Lane because there is an existing circa 2.5 metre stone wall; 1.8 wooden fence and 1 metre embankment in places that surrounds the boundary to both (see below). None of the boundary features are of any archaeological merit.



View point 1 View point 2

7.14 View Point 2: The view from the edge of the conservation area boundary towards the site is restricted and separated by a hedgerow and an existing dwelling referred to Halebourne. As a result the proposal is not visible (see above).

7.15 View Point 3: The view from the public footpath 158 running to the north of the site's boundary is set out below and both heritage assets are not visible because they are separated by an existing dwelling referred to as Knapp End (see below).





View point 3 View point 4

- 7.16 View Point 4: The view from the north east corner of the site's boundary towards the both heritage assets is severely restricted because they are separated by Halebourne, hedgerow and Knapp End. A small section of fence panel bordering the conservation area is partially visible through a gap in the vegetation (see above).
- 7.17 View Point 5 and 6: The view from point 5 is approximately where plot 5 will be located and again you can only see a glimpse of the bordering fence panel to the conservation area similar to view point 4. View point 6 is taken from public footpath 162 and it is deemed that both heritage assets are not visible from this point because of existing dwellings and hedgerow listed above (see below).





View point 5 View point 6

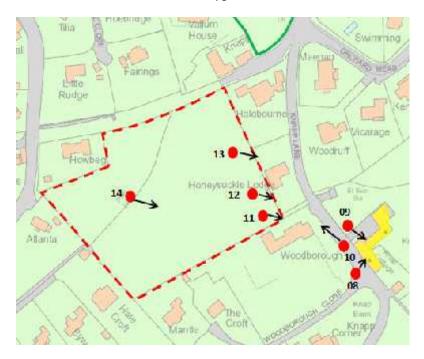
7.18 View Point 7: This view is taken near the site's entrance and it should be considered that views are severely restricted towards both heritage assets, however a small section of the stone wall and fence panel that border the conservation area are visible (see below).



View point 7

7.19 <u>View from Knapp Cottage and Knapp Orchard</u>

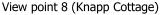
7.20 As set out above the boundary to Knapp Cottage and Knapp Orchard are circa 80 metres to the south east of the nearest proposed dwelling (plot 4). Views from various vantage points towards and from Knapp Cottage, Knapp Orchard and the site are assessed below:



Map of vantage points: Knapp Cottage and Knapp Orchard set out in yellow fill and site boundary in red dash

7.21 View Points 8 and 9: These viewpoints have been taken from Knapp Lane and have only been included to illustrate the features of both heritage assets (see below).







View point 9 (Knapp Orchard)

7.22 View Point 10: This view is taken from the corner of Knapp Cottage on Knapp Lane towards the site. It should be noted that the site is not visible from this point because views are obscured by hedgerow and existing dwellings that are referred to as Woodborough and Honeysuckle Lodge (see below). It should be noted that we were unable to record views from Knapp Orchard however it is expected that views are even more restricted because the property is lower than Knapp Cottage that is at road level.





View point 10

View point 11

- 7.23 View Point 11: This view is taken from the south east corner of the site towards both heritage assets. The view is severely restricted because of bordering trees and hedgerow to Woodborough, however part of the roof and chimney of Knapp Cottage are both visible. It should be considered that no windows to Knapp Cottage are visible and therefore views of the site are unlikely to be achieved from the building (see above).
- 7.24 View Points 12 and 13: view point 12 is taken from the southern boundary to Honeysuckle Lodge and it should be considered that hedgerow that defines the property's boundary completely blocks views toward both heritage assets. View point 13 is taken from the southern boundary of Halebourne and it should be noted that both heritage assets are clearly not visible from the site as they are blocked by Honeysuckle Lodge and its surrounding hedgerow (see below).





View point 12

View point 13

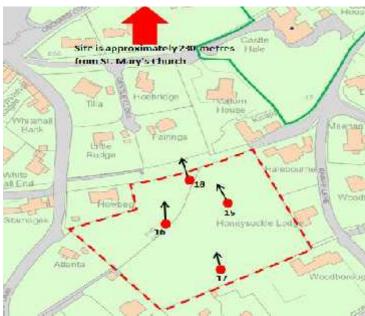
7.25 View Point 14: This view is taken from public footpath 162 and again views are severely restricted; however a glimpse of the top of the roof to Knapp Cottage is visible. The harm to the setting of Knapp Cottage will be less than substantial because the proposal will not be visible from it unless you are at the roof level and it should be considered that the loss of the view from the public footpath will be negligible because only part of the roof can be seen.



View point 14

7.26 View from the site towards St Mary's Church

7.27 The site is circa 230 metres from the boundary to St. Mary's Church and it should be considered that the site is clearly not visible from its grounds. Views from various vantage points towards the church are assessed below:



Map of vantage points: the site boundary is in red dash

7.28 View Points 15 to 18: the resulting viewpoints are illustrated below and it should be considered that the closer to the site's northern boundary the less visible the church spire becomes. Views from public footpath 162 will only be partially blocked between proposed plots 6 to 8 and therefore it should be considered that harm will be less than substantial. Furthermore it should be noted glimpses of the church's spire can be seen from circa 0.7 miles to the north (junction to Butcher's Arms on Cheltenham Road) and from a far greater distance to the south on Yokehouse Lane (circa 1.3 miles), as set out in the supporting Landscape and Visual Impact Appraisal.





View point 12



View point 13



View point 14

View point 15

- 7.29 From the above assessment a design has been prepared in order to protect and enhance the special qualities of the above assets and it should be considered that the only views that will be lost are from public footpath 162 towards Knapp Cottage where only its roof is visible and views towards the church's spire between plots 6 to 8. This harm is less than substantial and should be outweighed by resulting benefits created from the proposal.
- 7.30 It should be considered that the proposed dwellings at this Outline stage are to be set back from the site's boundary and will be at low density to reflect other surrounding spacious plots (illustrated below).
- 7.31 By using this designed approach the proposal will have a negligible impact on surrounding heritage assets.



Proposed Indicative Site Plan (site outlined in red)

8. **CONCLUSION**

- 8.1 The character of Painswick's historic assets has been identified and an appropriate scheme has been designed to minimise any impact. This design, whilst illustrative, can be reflected within the Reserved Matters Application with a tight set of design parameters set out above and within the accompanying planning application documents.
- 8.2 The significance of the heritage assets are important to the locality and the wider, especially the Grade I church. However the impact of the proposed development on the important heritage assets is small to no impact.
- 8.3 Paragraph 195 of the NPPF states 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. In this instance it is considered there is no harm for the reasons set out above, however the public benefit is the provision of much needed residential development, in an appropriate location, including 2 affordable houses.