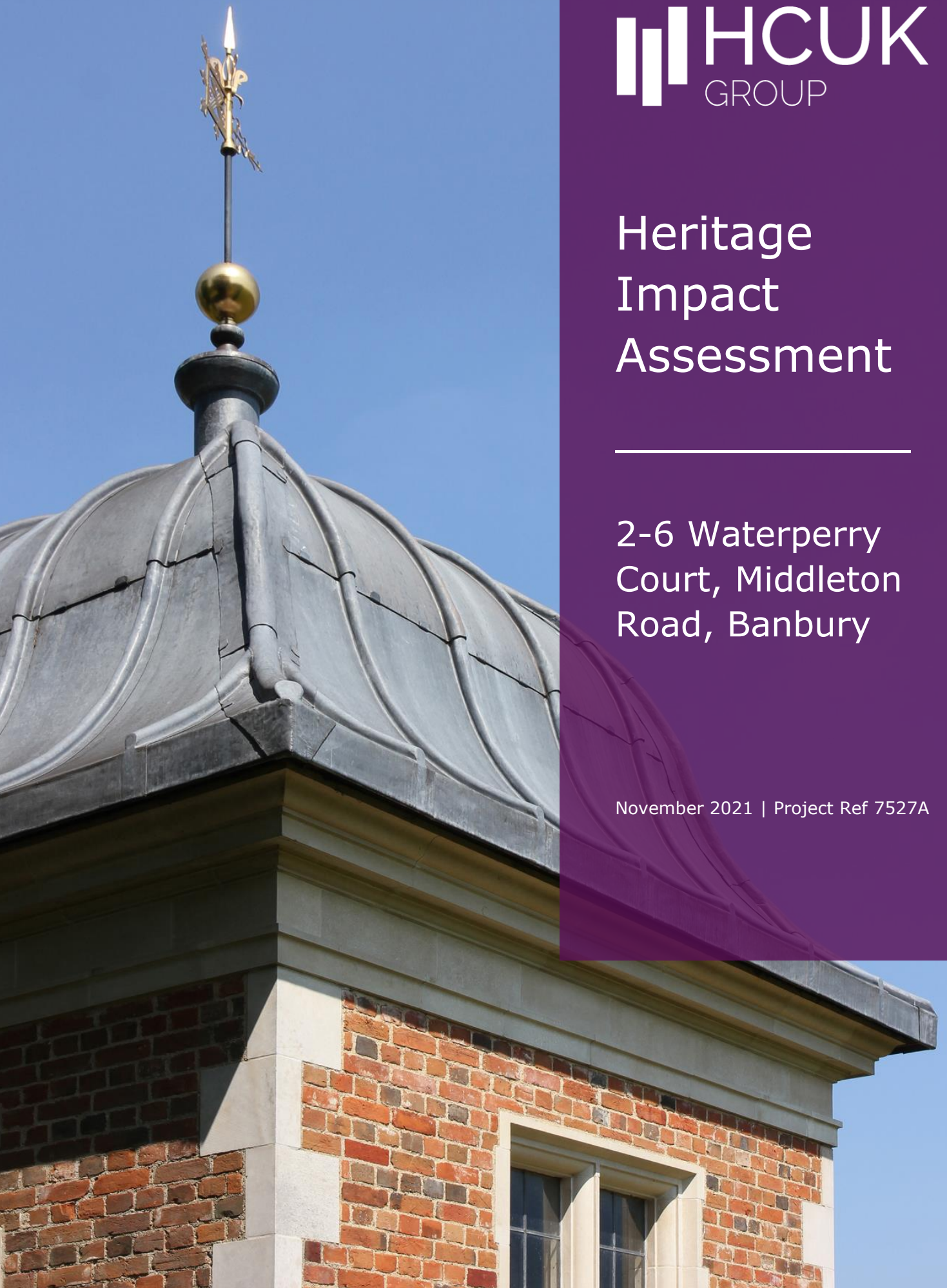




Heritage Impact Assessment

2-6 Waterperry
Court, Middleton
Road, Banbury

November 2021 | Project Ref 7527A



HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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Appendices

App. 1 Scale of Harm table (HCUK, 2019)

App. 2 GPA3 Assessment: Historic England’s Guidance on Setting

1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Waterperry Court Developments Ltd. It relates to an application for planning permission for the conversion of 2-6 Waterperry Court, Banbury from offices to a hotel and various alterations and extensions to the building. Cherwell District Council (CHC hereafter) are the determining authority.



Figure 1: Waterperry Court, the application site

1.2 The application site is a late 20th century office building located south of the junction between Bridge Street and Merton Street. East of the site is the boundary of the Grimsbury Conservation Area and the grade II listed former Elephant and Castle Public House. There are no other heritage assets, designated or otherwise, within the vicinity capable of being affected by the proposals.

1.3

In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (NPPF, 2021) this statement describes the significance of the identified designated heritage assets.

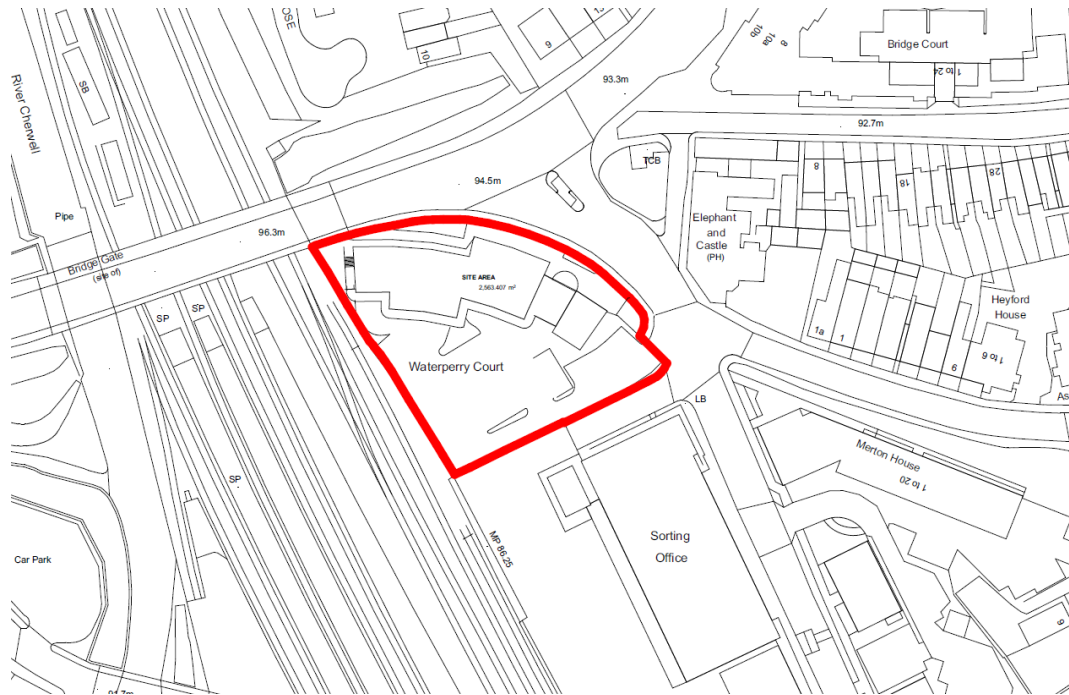


Figure 2: Site location plan showing the boundary of the conservation area and location of the nearby listed building

The Proposals and Relevant Background

1.4

The proposals seek to convert the existing building from office use into a Travelodge Hotel. In order to achieve this, proposals entail various alterations and extensions to the existing building which can be summarised as:

- Demolition of the south east part of the building and its replacement with a part two, part three storey addition;
- Upwards extension of an additional single storey to the north west of the building;
- Replacement of existing pitched roofs with flat roofs; and
- Revised elevational treatment to the building including the introduction of new buff and red brick cladding, render and grey cladding.

- 1.5** These proposals have been informed by a clear understanding of heritage considerations and by detailed pre-application advice (LPA ref: 21/02585/PREAPP) received from the Council.

Purpose of this Statement

- 1.6** The purpose of this report is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment, namely the Grimsbury Conservation Area and grade II listed former public house. Value judgements on the significance of the identified heritage assets are presented and the effects of the proposals upon that significance are appraised. The report sets out how the proposal complies with the guidance and policy of the NPPF and local planning policy. The site and listed building have been observed and assessed by the author following a site visit in October 2021.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas. However, this duty does not extend to the setting of a conservation area.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

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.

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

2.6 Historic England has produced guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.7 The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁴ The Scale of Harm is tabulated at **Appendix 1**.

2.8 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁵ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.9 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

⁴ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁵ The balancing exercise was the subject of discussion in *City and Country Bramshill v CC SLG and others* [2021] EWCA, Civ 320.

- 2.10** Relevant local planning policy documents include the Adopted Cherwell Local Plan 2011-2031 (Part 1) and saved policy of the Adopted Cherwell Local Plan 1996. The following policies are relevant:
- 2.11** **Policy ESD 15 The Character of the Built and Historic Environment:** This policy notes that new development is expected to complement and enhance the character of its context through sensitive design. All new development will be expected to meet high design standards and conserve, sustain and enhance designated and non-designated heritage assets. The policy then provides a comprehensive list of criteria that new development should meet.
- 2.12** **Saved Policy C18 Development Proposals Affecting a Listed Building:** The policy notes that in determining listed building consent applications, the council will have special regard to the desirability of preserving the building or its setting.

3. Background and Development

3.1 Historic mapping from the 19th and 20th centuries demonstrate that the application site once featured a large single dwelling and its grounds, named Cherwell House (Figures 3 and 4).



Figure 3: 1885 OS Map (surveyed 1881). Reproduced with permission of the National Library of Scotland



Figure 4: 1922 OS Map (revised 1920). Reproduced with permission of the National Library of Scotland

3.2 No evidence of the physical appearance of Cherwell House has been found but it would appear to have dated to at least the 19th century, perhaps having been constructed at the same time as the introduction of the railway.

3.3 Cherwell House stood on the site up until the 1980s at which point the site was redeveloped to provide the existing office building present today. The existing office building is characteristic of 1980s design featuring a combination of buff and red brick walls, large pitched roof with central gable pediment, red metal window frames and high level signage.



Figures 5 and 6: Existing building present on the site

4. Statement of Significance

Assessment of Significance

- 4.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and (where applicable) it comments on the contribution of setting to significance. This chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment) and, with regards to the listed building, the tabular methodology at **Appendix 2**.

Grimsbury Conservation Area

- 4.2** The area now forming Grimsbury has a long history (explored in more detail in the Grimsbury Conservation Area Appraisal, CDC 2007) including the presence of a medieval hermitage first mentioned in 1531 (located directly north of Waterperry Court). Historically, Middleton Road was a turnpike from Banbury into Northamptonshire and this led to development on the eastern side of the bridge from the 17th century onwards. However, much of the built form within the conservation area is of a residential nature and dates from the mid to late 19th century.
- 4.3** This residential development came about as a result of the Banbury Freehold Land Society. The society, designed to increase the voting population, started in 1851 when 13 acres of land to the north of Middleton Road was purchased for development. The plots were soon divided and by 1855 some 50 houses had been built or were under construction. This development then acted as the impetus for greater residential development in the area.
- 4.4** Houses were typically designed and constructed for the middle class population and a variety of styles were used including Gothic, Italianate and Classical Revival. Original detailing would have included timber doors and sash window with some decorative brick quoins and banding. While many of the houses have been altered the conservation area appraisal notes that “...*enough houses remain little altered to*

give the impression of the homogeneity of appearance that at one time existed and a small number of buildings still retain detailing of quality...".

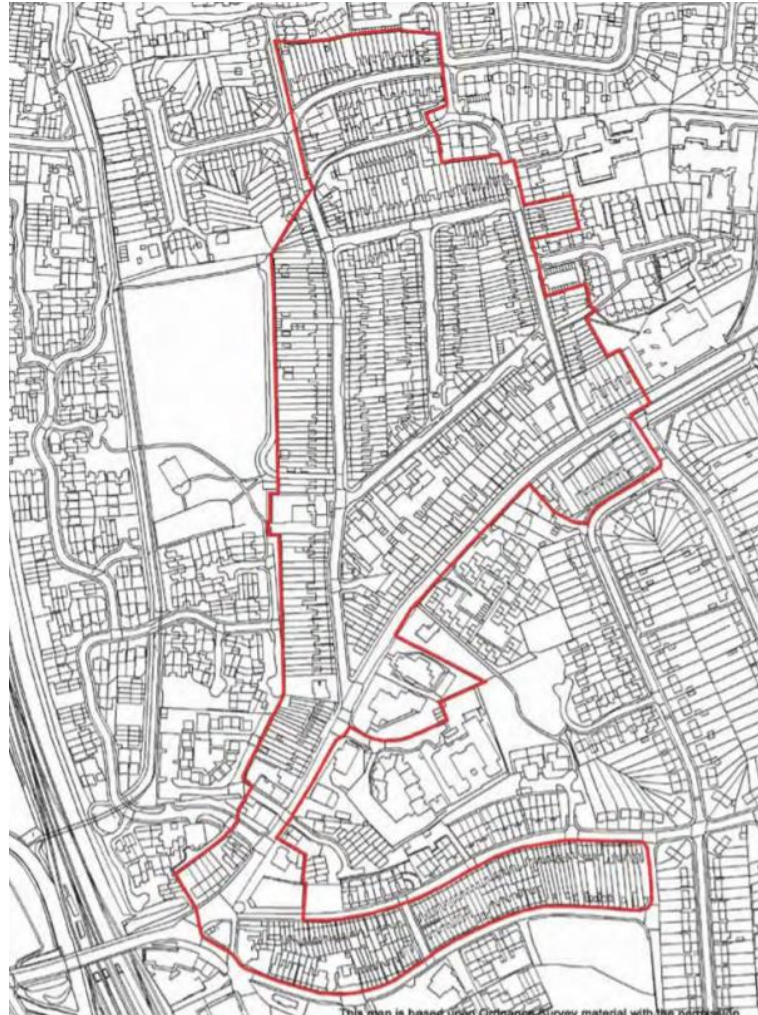


Figure 7: Grimsbury Conservation Area boundary map © CDC

4.5

Overall, the Grimsbury Conservation Area Appraisal defines the special interest of the conservation area as:

"The importance of the Grimsbury estate is not so much what it is but what it stands for and the historic context of the site. The development of the South Grimsbury area by the Banbury Freehold Society was revolutionary not because of what got built, which were standard nineteenth century dwellings, but because the scheme was based on the innovative principles of working-class self-help.

The Freehold Estate in Grimsbury was established in the heyday of the Freehold movement. It shares, in common with other freehold estates, the dense allocation of lots, provision of a church and public houses (surprising given the strong temperance leanings of the founding fathers). Villa 'gentrification' is marginal and the houses are distinctly urban in character, features which seem to characterise the early days of freehold estate development (Goodey, unpublished document)."



Figures 8 and 9: Characteristic terrace housing within the Grimsbury Conservation Area

4.6 As such, while the area is primarily designated due to its historic interest relating to the political process that supported its development in the latter half of the 19th century, it is also of interest due to it being representative of the spectrum in working class and artisan housing constructed in the period.

4.7 In terms of views, the conservation area appraisal notes that:

"Due to the level topography and the density of development there are no panoramic views into or out of the area. In fact New Grimsbury is a remarkably inward looking area with buildings enclosing all views out."

4.8 As such, views out of the conservation area, while possible, are limited and are not found to contribute to the significance of the area. It is inward looking views within the conservation area that are of importance. This is reflected by the conservation area appraisal's visual analysis which shows that 'attractive views' and those with important 'visual stops' are inward facing.

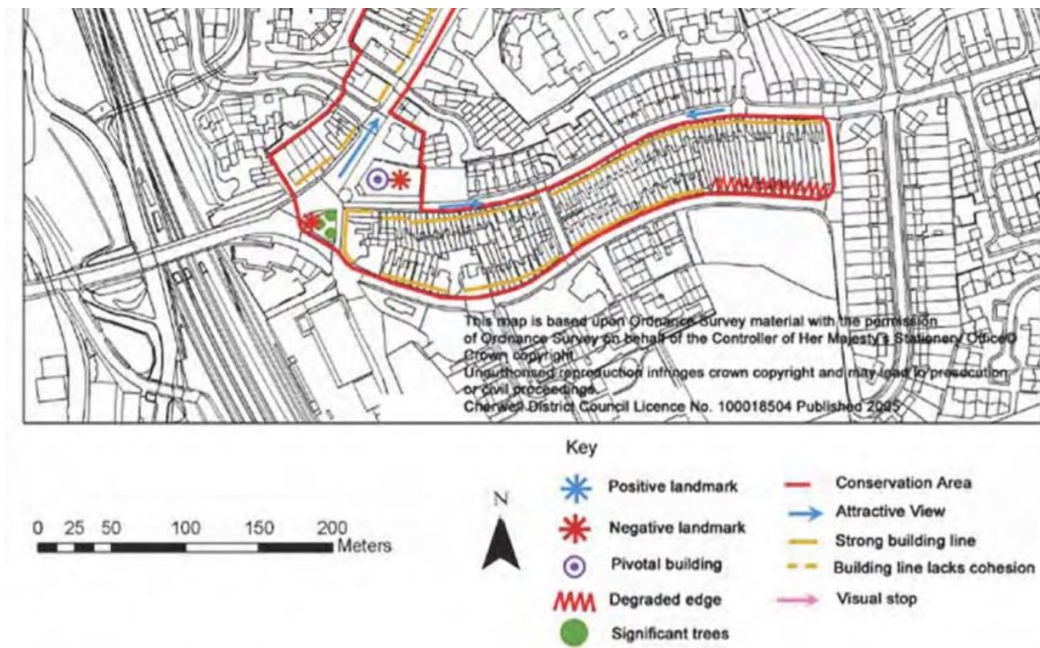


Figure 10: Extract from the conservation area appraisal's visual analysis map

4.9 The setting of the conservation area varies around its boundary but is generally highly altered from the rural character present during the late 19th century. This includes modern residential and commercial built form demonstrating the gradual expansion of Banbury over the 20th and 21st centuries. The setting of the conservation area around the application site has a mixed character featuring modern residential blocks of flats and commercial structures which surround the large urbanised road structure between Bridge Street, Middleton Road, Causeway and Merton Street. The modern built form in the setting of the conservation area does not contribute to its significance in any way.

4.10 Key elements of the setting which do contribute to the significance of the conservation area include the nearby railway station (part of the impetus for the area's first development), the river Cherwell (which, alongside the railway severs this part of the town from the centre) and the historic town centre of Banbury.

Former Elephant and Castle Public House (grade II)

4.11 The Elephant and Castle is a late 17th or early 18th century former dwelling which was grade II listed in 1986.



Figure 11: Former Elephant and Castle Public House (grade II)

4.12 It's Historic England List Description provides a good description of the exterior of the building and reads:

"House, now hotel and public house. Late C17/early C18. Regular coursed ironstone rubble. Steeply pitched slate roof. Ironstone copings to left and right. Ironstone quoins. Brick ridge and end stacks to right on rendered stone bases. 2 storeys plus attic. 3-window range. 3-unit plan. Central entrance has 4-centred arched doorway with chamfered soffit and jambs. C20 door. Doorway is flanked by C20 windows with chamfered wooden lintels. 3 similar renewed C20 windows to first floor have chamfered wooden lintels. 2 flat-roofed roof dormers. 2-storey extension to rear left: ironstone with slate roof. Plank door to left with wooden lintel. C20 windows to ground and first floor. Interior not inspected. Large red brick extension attached to the right is not of special architectural interest."

4.13 When first constructed it is likely that the building was a simple narrow road fronting range of single room depth and two storeys with attic. Various historic changes have been made to the building which can be summarised as:

- An 18th century two storey narrow range (constructed of ironstone with a slate roof) added to the rear left hand side;
- A late 19th century two storey red brick extension was added to the right hand side of the rear elevation;
- Late 19th century introduction of red brick outbuildings incorporated an 18th century ironstone gable fronting Middleton Road; and
- Between 1922-1930 the addition of the large flat roofed brick addition to the right hand side of the building (replacing earlier built form).

4.14 The building is currently in poor condition and has recently been consented for residential conversion including the introduction of new built form on the site.



Figures 12 and 13: Side and rear elevations of the former public house

4.15 The former public house is of clear architectural and historic (specifically illustrative) interest as a late 17th or early 18th century dwelling of vernacular character. Externally the interest of the building primarily derives from the vernacular detailing of the ironstone portions while internally the plan form, exposed timber framing, historic joinery (where surviving, including a number of 18th or early 19th century window surrounds and first to second floor staircase) and character of the spaces contributes to both the architectural and historic interest of the building.

4.16 The building is also of archaeological interest as a multiphase building containing standing material and both internal and external features from a wide variety of periods the building which has the potential to yield further evidence about the past

and the creators of this place which may not be reflected in other documentary sources.

- 4.17** While not original to the building, the various later additions and extensions are reflective of the way in which the building has developed over time. The 18th and late 19th century rear extensions are of some value due to their age and character but the early to mid 20th century addition (and later rear extensions) detract from the building's significance and are noted as being of no special interest as part of the List Description.
- 4.18** The structure is thought to have been converted to a public house by c.1850 and as such, while originally built as a single dwelling, possesses a degree of communal value as a historic public house.
- 4.19** The setting of the former public house has changed considerably since the building was first constructed. During the 17th or early 18th centuries the area was likely to have been relatively rural with sporadically located dwellings. During the 17th century Middleton Road was a historic turnpike from Banbury into Northamptonshire and this led to development on the eastern side of the bridge from the 17th century onwards. During the 19th century there were fundamental changes as shown on historic mapping. The introduction of the railway in 1850 effectively severed this part of the town from the main core of Banbury and shortly after there was a demonstrable increase in residential development in the area with the expansion of Grimsbury. Today the setting of the building is heavily developed with a mixed and varied character. There are 19th century terraces of Grimsbury to the east and more modern residential blocks of flats and commercial structures to the west which surround the large urbanised road structure between Bridge Street, Middleton Road, Causeway and Merton Street. Modern commercial buildings in the setting of the listed building do not contribute to or better reveal the significance of the grade II listed building in any way.
- 4.20** Elements of the setting of the listed building which do contribute to its significance include:
- The 19th century terraces of Grimsbury to the east. While much later in date to the public house, these terraces represent the historic context of the

building and reflect its value as a former public house serving the population of Grimsbury;

- The private rear gardens and ancillary curtilage associated with the former public house; and
- The grass area to the west of the listed building which helps provide some softening and separation between the building and the large urban road junction.



Figures 14 and 15: Modern built form visible in the context of the listed building, including the application site (right)



Figures 16 and 17: Modern built form visible in the context of the listed building

Contribution of the Application Site to Heritage Assets

4.21 As noted above modern commercial buildings in the setting of both the listed building and conservation area, do not contribute to or better reveal the

significance of these assets in any way. The existing building on the application site falls into this category.

- 4.22** This building, dating from the 1980s is not of any heritage value in its own right and does not share any historic links or associations with the assets which would elevate its value or contribution. Stylistically, the building is characteristically of its time as a 1980s office structure and one which has not aged well. Due to its form and siting close to the pavement edge, the building is noticeably one of the larger buildings present facing the large urban junction of roads but does step down in scale closest to the listed building and conservation area boundary in recognition of the presence of these assets.
- 4.23** Specifically with regards to views, the application site does not feature in any key views of either the listed building or the conservation area. With regards to the listed building, key views are from the west looking towards its front elevation (with the site behind the viewer) and with regards to the conservation area, all important views (as noted above) are inward facing. Additionally, the site does not appear in any 'attractive views' or views with 'visual stops' within the conservation area as confirmed by **Figure 10**.
- 4.24** Overall, the modern commercial building on the application site does not contribute to or better reveal the significance of the identified heritage asset in any way. Instead, the building forms a neutral element of the setting of the listed building and conservation area.

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including effects on the setting of those assets. It equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in **Appendix 2**.

Proposed Development

5.2 As noted in the Introduction, the proposed development seeks to convert the existing building into a hotel and undertake various alterations and extensions to the existing structure. The works amount to a modest increase of massing on the application site, including built form moving slightly closer to the listed building and conservation area boundary. In response to this, proposals retain a clear stepping down of built form towards these assets and while heights are increased across the building at various points, the overall ridge height of the structure is not breached. The increase of massing is shown in **Figure 18** with the main elevation overlaid with the outline of the existing building in red.



Figure 18: Proposed front elevation of the hotel, red line indicates the existing building outline

5.3 In terms of architectural appearance, the proposed development seeks to retain the existing materiality of the building (a combination of red and buff brick) but enhance this through the introduction of new brick elements, render and cladding

panels. The existing pitched roof would be replaced with a flat metal seam roof. These changes to the building would result in the structure possessing a far more high quality honestly modern character overcoming the existing dated character of the structure which, as a 1980s office building, has not aged well.

Impact Assessment

5.4 As identified in the preceding section, the existing building does not contribute to or better reveal the significance of the Grimsbury Conservation Area. Instead, as a 1980s office building within a predominantly modern and urban part of the asset's setting, the existing building on the site makes a neutral contribution to the significance of this asset.

5.5 Similarly, with regards to the listed building as noted in the preceding section, the setting of the former public house has changed considerably since the building was first constructed from having a rural character to a heavily developed mixed and varied character today. The existing built form on the application site, as with other modern residential and commercial elements of the asset's setting, does not contribute to or better reveal the significance of the listed building in any way.

5.6 While proposals would result in a modest increase of massing on the application site with built form brought slightly closer to the listed building and boundary of the conservation area, the existing stepped character (where there is a notably stepping down of built form close to the heritage assets) has been replicated. In addition, while heights are increased to a minor degree at a small number of points, the overall ridge height of the structure is not breached. For these reasons, while the scale of the building will be modestly increased in places, the proposed hotel would not be prominent or dominant within the setting of either the listed building or conservation area. Similarly, the proposed development would not compete with or distract attention away from the former public house or conservation area.

5.7 With regards to views in and out of the conservation area, the appraisal states:

"Due to the level topography and the density of development there are no panoramic views into or out of the area. In fact New Grimsbury is a remarkably inward looking area with buildings enclosing all views out."

5.8 As such, views out of the conservation area, while possible, are limited. Changes in such views resulting from the minor change to the built form on the application site would not affect any key views. Important inward looking views within the conservation area would not be affected. In addition, the application site does not feature within any 'attractive views' or 'visual stops' identified within the conservation area's visual analysis (replicated at **Figure 10** of this report). In addition, there would be no change to any important elements of the conservation area's skyline or silhouette as a result of the proposed development.

5.9 Key views of the listed building are possible from the west (from the road junction and piece of grass present opposite the building) where the front elevation of the historic building, and its later extensions and outbuildings, can be fully appreciated. In these views, the application site is behind the viewer. As such there would be no changes to the views. The only area where a change to the skyline or silhouette of the listed building may be possible are in views from the causeway directly north of the listed building. These are not key views of the listed building (showing mostly a later side extension and side elevation of a 19th century outbuilding). The views already feature the modern built form of the application site in the background. Due to the increase of scale on the site as a result of the proposals there is likely to be a minor change to this view increasing visibility of the modern building behind. Importantly, the proposals would not obscure the building in this view or radically altered existing views which already feature modern built form.



Figures 19 and 20: Existing views from the Causeway (to the north of the listed building) which will undergo some change as a result of the proposed development

- 5.10** As noted within the preceding section, while much altered, various elements of the setting of the former public house contribute to its significance. These elements of setting (including the 19th century residential terraces, its private gardens and curtilage and the grassed area to the west) remain entirely unaltered as a result of the proposed development.
- 5.11** Overall, while the proposed development would result in a change within the setting of the listed building and conservation area, this would only amount to a minor change to its built surroundings in an already heavily altered and modern part of the setting of these assets. The modest increase of scale on the application site and aesthetic enhancements to improve the quality and character of the building would not result in any change to the general character of the setting of the listed building or conservation area. These assets would remain appreciable within a mixed context which includes some 19th century development, modern residential blocks of flats and commercial structures and the large urbanised road structure between Bridge Street, Middleton Road, Causeway and Merton Street.

Policy Compliance

- 5.12** For the reasons identified above, the proposed development would not affect the significance, or ability to appreciate the significance, of the Grimsbury Conservation Area or the former Elephant and Castle Public House (grade II). These assets are sufficiently robust in their architectural character and historic interest to accommodate a minor degree of change as proposed within their setting. The strong heritage values of the conservation area and the distinctiveness and unique contribution that the listed building makes to its surroundings would be unaffected by the proposed development.
- 5.13** As such, the proposals would fall outside the remit of paragraphs 201-202 of the NPPF insofar as there would be no harm to significance. There would be preservation for the purposes of the decision maker's duty under Sections 66 and 72 of the 1990 Planning (Listed Building and Conservation Area) Act 1990.
- 5.14** The proposals are also found to comply with the requirements of relevant local planning policy as follows:

- **Policy ESD 15 The Character of the Built and Historic Environment:**

The proposed development accords with the requirements of this policy insofar as the development would complement and enhance the character of its context through sensitive design and would conserve and sustain the significance of the conservation area and listed building.

- **Saved Policy C18 Development Proposals Affecting a Listed Building:**

In accordance with the requirements of this policy, the significance and setting of the listed building would be preserved.

6. Conclusions

- 6.1** This Heritage Statement has been prepared in accordance with paragraph 194 of the NPPF and supports an application for planning permission relating to the conversion of the existing office building on to the application site to a hotel alongside various alterations and extensions to that building. There are no heritage assets on the site but the application site is located within the setting of the Grimsbury Conservation Area and the grade II listed former Elephant and Castle Public House.
- 6.2** This report provides a proportionate assessment of the significance of the heritage assets affected and this is followed by an assessment of the effect of the proposals on that significance.
- 6.3** As noted in the preceding section, the proposals seek to sensitively upgrade and extend the existing office building so that it can viably function as a hotel. The proposed development has been carefully designed to provide a high quality modern character, upgrading the existing dated form of the building. While representing a modest increase of scale on the site, the overall height is no greater than the existing ridge line and the building steps down closest to the listed building and conservation area.
- 6.4** The assessment presented in section 5 (supported by the tabular assessment within **Appendix 2**) concludes that while the proposals would result in a change within the setting of the conservation area and listed building, these assets are all sufficiently robust in their architectural character and historic interest to accommodate this minor degree of change. There would be no change to the character of these assets' setting and the modest increase of massing on the site would not dominate or compete with the assets.
- 6.5** In summary, the proposed development is considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. The proposed development falls outside the remit of paragraphs 201-202 of the NPPF insofar as there would be no harm caused to the significance of the identified heritage assets. There would be preservation for the purpose of the decision maker's duty under Sections 66 and 72

of the Planning (Listed Building and Conservation Area) Act 1990 and the proposals are also found to be compliant with relevant local planning policies.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁶

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁶ See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

GPA3 Assessment: Historic England’s guidance on setting

In assessing the effect of the proposed development on the setting and significance of the Grimsbury Conservation Area and former Elephant and Castle Public House, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

Relevant Considerations	Grimsbury Conservation Area	Former Elephant and Castle Public House (grade II)
<i>Proximity of the development to the asset</i>	The application site is located adjacent to the boundary of the Grimsbury Conservation Area on the south side of Merton Street	The application site is located opposite the listed building, on the opposite side of Merton Street
<i>Proximity in relation to topography and watercourses</i>	The area’s topography is broadly flat and there are no watercourses of relevance with regards to these assets	
<i>Position of development in relation to key views</i>	In accordance with the findings of the conservation area appraisal: “Due to the level topography and the density of development there are no panoramic views into or out of the area. In fact New Grimsbury is a remarkably inward looking area with buildings enclosing all views out.” As such, views out of the conservation area, while possible, are limited. Changes in such views resulting from the minor change to the built form on the application site would not affect any key views. Important inward looking views within the conservation area would	Key views of the listed building are possible from the west (from the road junction and piece of grass present opposite the building) where the front elevation of the historic building, and its later extensions and outbuildings, can be fully appreciated. In these views, the application site is behind the viewer. As such there would be no changes to the vieww

	not be affected. In addition, the application site does not feature within any 'attractive views' or 'visual stops' identified within the conservation area's visual analysis (Figure 9)
<i>Orientation of the development</i>	The orientation of built form on the application site will not change as a result of the proposals
<i>Prominence, dominance and conspicuousness</i>	While proposals would result in a modest increase of massing on the application site, proposals retain a clear stepping down of built form towards the conservation area and listed building. In addition, while heights are increased across the building, the overall ridge height of the structure is not breached. For these reasons, while the scale of the building will be increased, the proposed hotel would not be prominent or dominant within the setting of either the conservation area or listed building
<i>Competition with or distraction from the asset</i>	For the reasons identified above and referenced throughout this tabular assessment, the proposals would not compete with or distract attention away from the conservation area or listed building
<i>Dimensions, scale, massing, proportions</i>	Proposals would result in a modest increase of massing on the application site, including built form moving closer to the listed building and conservation area boundary. However, proposals retain a clear stepping down of built form towards these assets and while heights are increased across the building at various points, the overall ridge height of the structure is not breached
<i>Materials and design</i>	The proposed development seeks to retain the existing materiality of the building (a combination of red and buff brick) but enhance this through the introduction of new brick elements, render and cladding panels. The existing pitched roof would be replaced with a flat metal seam roof. These changes to the building would result in the structure possessing a far more high quality honestly modern character
<i>Diurnal or seasonal change</i>	Matters of diurnal and seasonal change are not relevant in this case
<i>Change to built surroundings and spaces</i>	The proposed development would result in a minor change to the built surroundings of the conservation area and listed building which could be characterised as a modest increase of scale on the application site and aesthetic enhancements to improve the quality and character of the building. There would be no change to spaces in the setting of these

	assets (i.e. the grassed area opposite the listed building and the urbanised road structure)	
<i>Change to skyline, silhouette</i>	There would be no change to the skyline or silhouette of the conservation area as a result of the proposed development	The only area where a change to the skyline or silhouette of the listed building may be possible are in views from the causeway directly north of the listed building. These are no key views of the listed building (showing mostly a later side extension and side elevation of a 19 th century outbuilding). The views already feature the modern built form of the application site in the background. Due to the increase of scale on the site as a result of the proposals there is likely to be a minor change to this view increasing visibility of the modern building behind. Importantly, the proposals would not obscure the building in this view or radically altered existing views which already feature modern built form
<i>Change to general character</i>	There would be no change to the general character of the setting of the conservation area and listed building which will still be characterised by a mix of modern residential blocks of flats and commercial structures which surround the large urbanised road structure between Bridge Street, Middleton Road, Causeway and Merton Street	

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

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

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)