

BREEZE HOLDINGS LTD
DECEMBER 2022



HERITAGE STATEMENT
26-28 ROCHESTER PLACE
LONDON

Quality Assurance

Site name: 26-28 Rochester Place
London NW1 9JB

Client name: Breeze Holdings Limited

Type of report: Heritage Statement

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Signed



Date 30/10/2019

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Signed



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1.0 Introduction

- 1.1 This Heritage Statement has been produced by Bidwells on behalf of Breeze Holdings Ltd to support proposals for 'two-storey upwards extension to an existing mixed use (residential and office) building to form 10 additional flats' at 26-28 Rochester Place, NW1 9JB, henceforth called 'the Site'.
- 1.2 The existing building replaced a former warehouse and was completed in 2010. The building is four storeys with a basement below. Commercial space is located on the ground and first floors with residential units positioned on the upper floors. The exterior of the building is formed of large glass panes and metal cladding.
- 1.3 To the north-east and north-west of the site are semi-detached, mid-19th century villas. These are three storeys high with a stuccoed ground floor and stock brick upper floors. The roofs of these buildings are hidden behind parapets. To the south-east and south-west of the Site the surrounding structures have been replaced or redeveloped over time, and as such exhibit a variety of building dates and styles. These structures are between two and seven storeys high, topped with flat roofs.
- 1.4 The Site is not subject to any heritage designations (either statutory or local) within the extent of its perimeter. However, there are a number of locally listed assets in the immediate and wider context of the Site (streetscene features and buildings). The Site is bordered to the north-west and north-east by the Rochester Conservation Area. There are a number of Grade II listed buildings and assets in the wider surrounds of the Site, the closest of which are located 100m west of Site on St Pancras Way. These assets will be considered in greater detail in Sections 5 and 6 of this report.



Figure 1 – Aerial image indicating location of the Site, with the boundary marked in red (Google Maps, 2022)

- 1.5 This Heritage Statement includes a Significance Assessment which identifies the relative heritage value of the identified heritage assets and an Impact Assessment which considers the potential impact of the proposed development on the significance of the heritage assets identified, including the contribution made by setting. This approach to impact-assessment is required in order to satisfy the provisions of Section 66(1) of the Planning (Listed Buildings & Conservation

Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on a heritage asset is being considered (Paragraphs 193-206).

Authorship

- 1.6 This document has been prepared by Steve Handforth BA (Hons) MSc and Daniele Haynes BA (Hons) MSc, and has been supplemented and reviewed by Sean McEntee BArchSt MA (Associate, Heritage and Design).

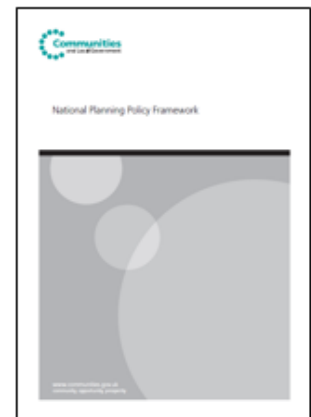
2.0 Heritage Legislation, Policy and Guidance Summary

Planning (Listed Buildings & Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 16(2) states “*In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*”
 - Section 66(1) reads: “*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 features of special architectural or historic interest which it possesses.*”
 - In relation to development on land within Conservation Areas, Section 72(1) reads: “*Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*”
- 2.2 As the proposal does not involve an application for Listed Building Consent and the Site does not fall within a Conservation Area, Sections 16(2) and 72(1) do not apply in this instance.

National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF) was revised in July 2021. With regard to the historic environment, the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that “*our historic environments... can better be cherished if their spirit of place thrives, rather than withers.*” The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.2 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a “*manner appropriate to their significance*” (Paragraph 189).
- 2.3 NPPF directs local planning authorities to require an applicant to “*describe the significance of any heritage assets affected, including any contribution made by their setting*” and the level of detailed assessment should be “*proportionate to the assets’ importance*” (Paragraph 194).
- 2.4 Paragraph 195 states that the significance of any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, “*to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal*”. This paragraph therefore results in the need for an



analysis of the impact of a proposed development on the asset's relative significance, in the form of a Heritage Impact Assessment.

- 2.5 An addition to the 2021 NPPF is outlined in paragraph 198. This states that local planning authorities should have regard to the importance of the retention '*in-situ*' of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.
- 2.6 Paragraph 199 requires 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.*"
- 2.7 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, "*clear and convincing justification*" (Paragraph 200). This paragraph outlines that substantial harm to Grade II listed heritage assets should be exceptional, rising to 'wholly exceptional' for those assets of the highest significance such as scheduled monuments, Grade I and Grade II* listed buildings or Registered Parks and Gardens as well as World Heritage Sites.
- 2.8 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 states the following:
- "Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- a. the nature of the heritage asset prevents all reasonable uses of the site; and*
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
 - c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use."*
- 2.9 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in "*less than substantial harm*", paragraph 202 provides the following:
- "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."*
- 2.10 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.
- 2.11 In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a "*balanced judgement*" having regard to the scale of any harm or loss and the significance of the heritage asset.

- 2.12 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.
- 2.13 With regard to Conservation Areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. Whilst it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*
- 2.14 Broader design guidance is given in Chapter 12, ‘Achieving well-designed places’. The 2021 NPPF introduces the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect ‘local character’ in order to create *‘beautiful and distinctive places’* (paragraph 127).
- 2.15 Paragraph 134 states that significant weight should be given to development which reflects local design policies, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the ‘standard of design’ providing they conform to the ‘overall form and layout of their surroundings’.

Planning Practice Guidance (PPG) (2019)

- 2.16 The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.
- 2.17 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.
- 2.18 In particular, the PPG notes the following in relation to the evaluation of harm: *“in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.”* (Ref ID: 18a-018-20190723).
- 2.19 This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a “high test”.
- 2.20 In relation to non-designated heritage assets, the PPG explains the following:
“Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.”
- 2.21 It goes on to clarify that: *“A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”*
- 2.22 This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England Conservation Principles: Policies and Guidance 2008

- 2.23 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

“New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (page 59).



Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

- 2.24 This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that *"The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting."* (page 10)

Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

- 2.25 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: *"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."* (page 1)

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

- 2.26 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: *'A staged approach to proportionate decision taking'* provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

- Step 1: Identify which heritage assets and their settings are affected
- Step 2: Assess 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
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decision and monitor outcomes

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

- 2.27 This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities' decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.
- 2.28 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Regional Policy

The London Plan (2021)

- 2.29 The London Plan was adopted in March 2021, the following policies are relevant to heritage and this application.
- 2.30 Policy D1 London's form and characteristics
- A. *Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:*
- Form and layout
- 1) *use land efficiently by optimising density, connectivity and land use patterns*
 - 2) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*
- Quality and character
- 12) *respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local character*

- 13) *be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.*

2.31 Policy HC1 Heritage conservation and growth

- A. *Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*
- B. *Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:*

- 1) *setting out a clear vision that recognises and embeds the role of heritage in place-making*

- 2) *utilising the heritage significance of a site or area in the planning and design process*

- 3) *integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*

- 4) *delivering positive benefits that sustain conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Policy

Camden Local Plan (2017)

2.32 The Camden Local Plan (2017) outlines plans for development and forms the basis for planning decisions in the borough. The document was adopted by the council on the 3rd July 2017 and replaces the Core Strategy and Camden Development Policies documents. The relevant policies set out within this document are:

2.33 Policy D1: Design

“The Council will seek to secure high quality design in development. The Council will require that development :

- a) respects local context and character;*
- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;...”*

2.34 Policy D2: Heritage

“The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site;*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

- e) require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f) resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g) resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h) preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.*

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. To preserve or enhance the borough’s listed buildings, the Council will:

- i) *resist the total or substantial demolition of a listed building;*
- j) *resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k) *resist development that would cause harm to significance of a listed building through an effect on its setting...*

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

Conservation Area Statements / Appraisals

- 2.35 The Rochester Conservation Area was first designated on the 12th December 2001. The Rochester Conservation Area Statement was adopted in December 2001.
- 2.36 Jeffrey's Street Conservation Area (1st November 1985) statement adopted November 2002.
- 2.37 The conservation Area Statements set out guidelines to effectively manage development within the conservation areas, and as the Site falls outside of their boundaries, it is not subject to these specific guidelines. However, the statements have been consulted with respect to understanding identified views within and beyond the conservation area boundaries, to ensure proposals for the Site will not impact these views.

3.0 Methodology

Heritage Assets

- 3.1 A heritage asset is defined within the National Planning Policy Framework as “*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*” (NPPF Annex 2: Glossary).
- 3.2 ‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.
- 3.3 The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that “*non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*” (Paragraph: 039 Reference ID: 18a-039-20190723)
- 3.4 However, the PPG goes on to clarify that “*a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.*”

Meaning of Significance

- 3.5 The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the “*aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups*” (Page 2, Article 1.2)
- 3.6 The NPPF (Annex 2: Glossary) also defines significance as “*the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.*”
- 3.7 The British Standards BS7913 (2013) notes that “*the attributes that combine to define the significance of a historic building can relate to its physical properties or to its context. There are many different ways in which heritage values can be assessed.*”
- 3.8 Significance can therefore be considered to be formed by a collection of values.

Assessment of Significance

- 3.9 It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 194 of the NPPF.

3.10 The Historic England document ‘Conservation Principles’ states that “*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment.*”

3.11 The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.

- Understanding the fabric and evolution of the asset;
- Identify who values the asset, and why they do so;
- Relate identified heritage values to the fabric of the asset;
- Consider the relative importance of those identified values;
- Consider the contribution of associated objects and collections;
- Consider the contribution made by setting and context;
- Compare the place with other assets sharing similar values;
- Articulate the significance of the asset.

3.12 At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset’s significance. Historic England’s ‘*Conservation Principles*’ sets out a grouping of values as follows:

Evidential value – ‘*derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.*’ (Page 28)

Aesthetic Value – ‘*Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive.*’ (Pages 30-31)

Historic Value – ‘*derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.*’ (Pages 28-30)

Communal Value – “*Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding*

eneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there”. (Pages 31-32)

- 3.13 Historic England advice Note 12 notes that ‘interest may be archeological, architectural, artistic or historic.
- 3.14 The British Standards set out a simpler approach which ‘*is to think of a historic building’s significance as comprising individual heritage values*’. These could include townscape characteristics, artistic value, educational value and identity or belonging amongst others.
- 3.15 It is therefore clear that value-based assessment should be flexible in its application. It is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of setting/context to significance

- 3.16 In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that ‘setting’ itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.
- 3.17 Historic England’s Conservation Principles defines *setting* as “*an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.*”
- 3.18 It goes on to state that “*context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places*” (page 39).
- 3.19 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.20 The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

- 3.21 It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that

value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.

- 3.22 There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established ‘James Semple Kerr method’ which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This ‘value hierarchy’ has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.
- 3.23 The first stage of our approach is to carry out a thoroughly-researched assessment of the significance of the heritage asset, in order to understand its value:

Table 1 Assessment of Significance

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable.

	Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

3.24 Once the value/significance of an asset has been assessed, the next stage is to determine the assets ‘sensitivity to change’. Table 2 sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.

3.25 An asset’s sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that, according to Historic England The Setting of Heritage Assets – Planning Note 3, ‘change’ does not in itself imply harm, and can be neutral, positive or negative in effect).

3.26 Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

Table 2 Assessment of Sensitivity

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

3.27 Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the ‘magnitude’ of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

Table 3 Assessment of Impact

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	Adverse: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction.

	Beneficial: The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.
High	Adverse: Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood. Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.
Medium	Adverse: Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised. Beneficial: Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.
Minor/Low	Adverse: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised. Beneficial: Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.
Negligible	Barely discernible effect on baseline conditions but a slight adverse or beneficial impact.
Neutral	A change or effect which is neither adverse nor beneficial in impact.
Nil	No change in baseline conditions.

Summary of Assessment

- 3.28 Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is *“proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”* as set out in Paragraph 194 of the National Planning Policy Framework.

Research Methodology

26-28 Rochester Place – Heritage Statement

- 3.29 This Heritage Statement is the result of a robust process which assesses relevant documentary research (including HER records, maps, drawings and reports, as well as, archive material where relevant) and professional judgment.
- 3.30 A site visit to inform the assessments being made was undertaken on 21 November and again on 1 December 2022 .

4.0 Historic Context

Introduction

- 4.1 Until the 19th century, Kentish Town was a rural village in the Parish of St Pancras. The majority of the properties were focused on the main road to Highgate giving the village a linear character. By the 18th century, the village became an area in which people would take furnished lodgings to escape the pollution and congestion of London.
- 4.2 The further development of the area occurred following Lord Camden's receipt of an act of Parliament in 1799 which enabled him to develop his lands along the east side of Camden High Street. Development of the fields beyond the main road in Kentish Town really began in the 1840s with early development spurred on by the sale of Lord Southampton's land and the creation of streets between Kentish Town and Haverstock Hill. With the area becoming fully developed by the end of the century.

Map Regression

- 4.3 A comprehensive assessment of a selection of available historic maps has been undertaken to assist in the understanding of the site. Although such information cannot be considered to be definitive, experience shows that the mapping is often relatively accurate and reliable, particularly the later Ordnance Survey (OS) Maps, and taken together with written archival data and the physical evidence can help to refine the history of a site. The indicative site location is shown in red on each map.
- 4.4 In the 1873 OS, the site is shown to be densely developed with a number of small structures. These structures were a mix of cottages and garages built back to back with a small yard at the centre called Clarendon Yard. Around the site are large villas and associated mews buildings set within formal gardens.



Figure 2 - Extract from the 1873 OS Map with the site boundaries marked in red, <https://maps.nls.uk/index.html>

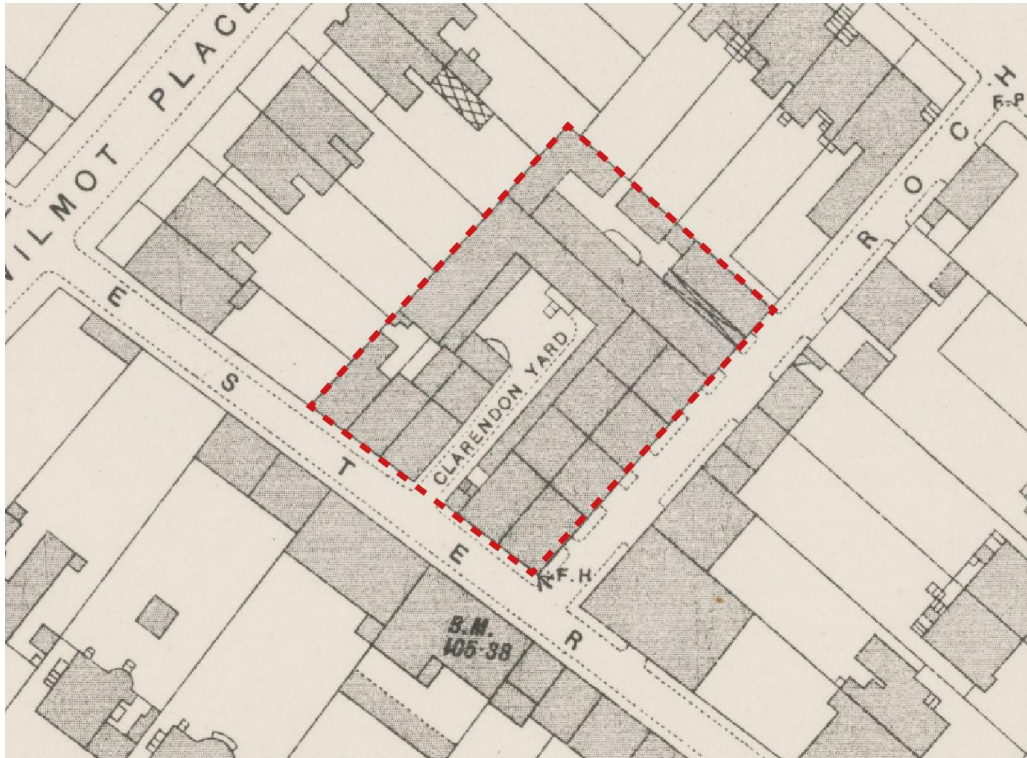


Figure 3 - Extract from the 1895 OS Map with the site boundaries marked in red, <https://maps.nls.uk/index.html>

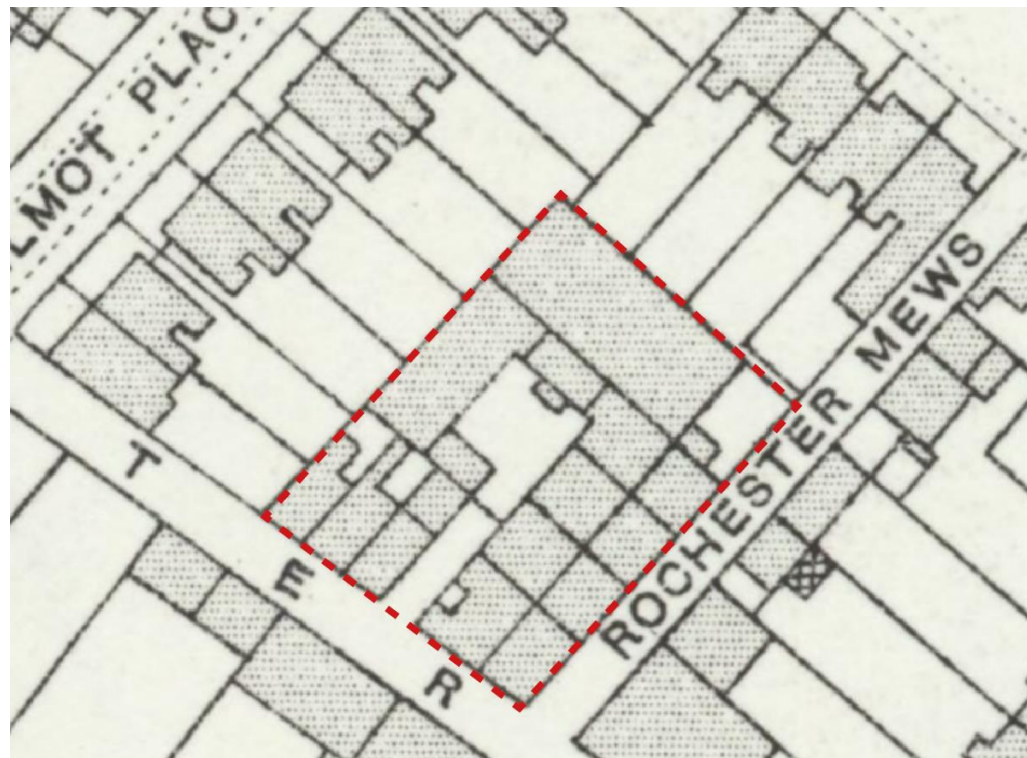


Figure 4 - Extract from the 1916 OS Map with the site boundaries marked in red, <https://maps.nls.uk/index.html>

- 4.5 This configuration remained until the Second World War when a bomb hit a property directly to the east, causing serious damage to many of the surrounding structures including some of the cottages which had stood on the site. In the south-east of the site the cottages are highlighted as being “for clearance”.

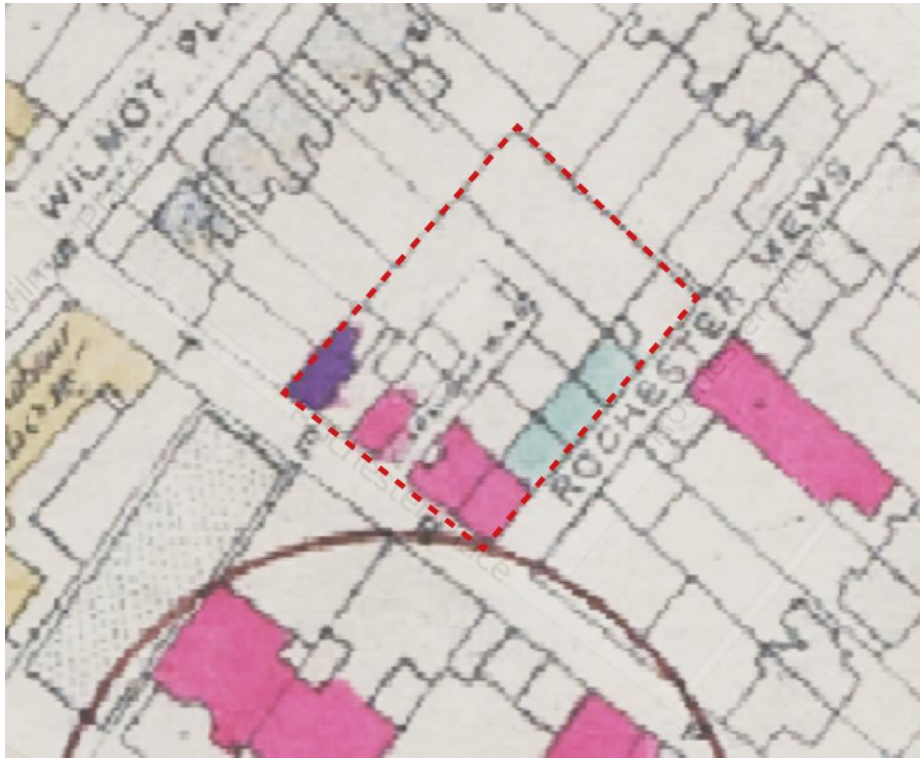


Figure 5 - Extract from the London Bomb Damage Map, 1945 with the site boundary marked in red, London Metropolitan Archives

- 4.6 Following this the site was cleared and a new warehouse was constructed at the north-east. In the south-west of the site, a two small properties were also constructed whilst an open area of land in the east was also portioned off as separate from the warehouse.

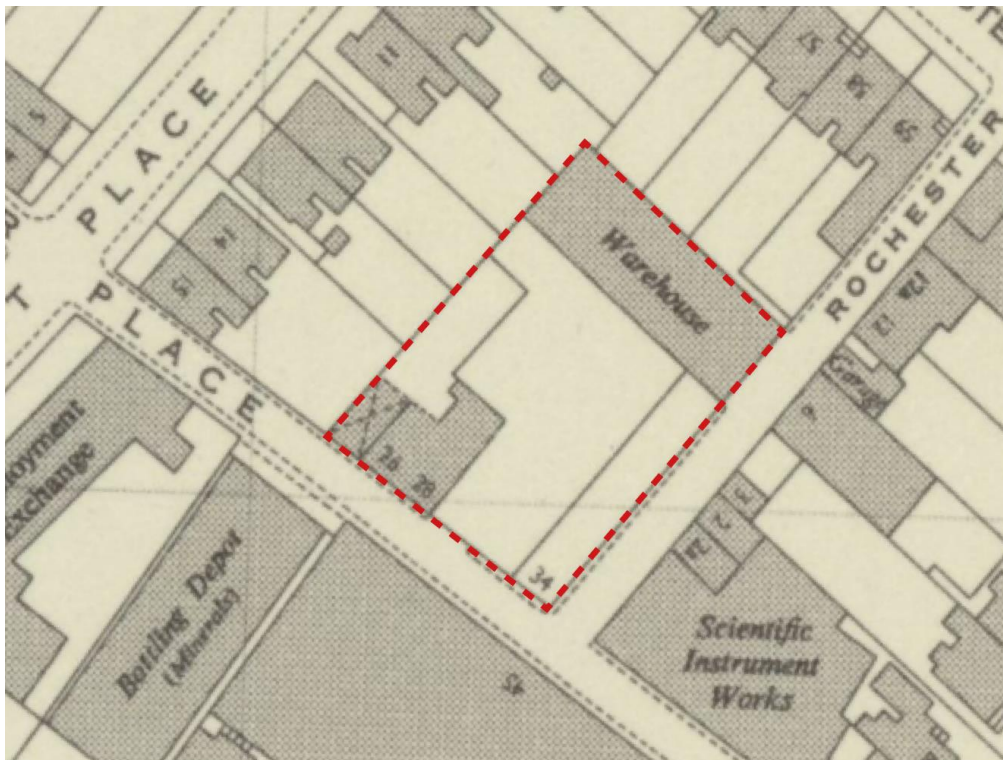


Figure 6 - Extract from the 1953 OS Map with the site boundaries marked in red, <https://maps.nls.uk/index.html>

- 4.7 The warehouse building was demolished and the exiting building on site was constructed in 2007/8.

Relevant Planning History

- 4.8 The following applications provide a relevant recent history of the site:

- 2006/1292/P - Internal reorganisation and change of use of ground and first floors from warehousing (Class B8) floorspace to form 10 flexible business units (class B1c), and the erection of a two-storey roof extension to create 13 two-bedroom flats (4x3 bed, 6x2 bed and 3x1 bed units)

Permission granted 14th June 2006 – subject to a Section 106 Legal Agreement

Within the Officer's Report it states that *"the proposal is to add two additional storeys to the existing building. The proposed additional bulk and massing is considered acceptable given the variety of building heights in the area, ranging from single-storey to four-storey buildings."*

- 2007/0524/P - Demolition of existing warehouse building (Class B8) and construction of a four-storey building including carparking at basement level, commercial units (Class B1) at ground and first floors and 13 residential (Class C3) units at second and third floors.

Permission granted 1st May 2007 – subject to a Section 106 agreement..

Within the Delegated Officer Report it states *"the height, bulk and massing of the proposal would be generally similar to the approved scheme (2006/1292/P). The*

proposals are therefore considered acceptable in principle as the design includes the [setting back of the 2nd and 3rd storey]”

The report continues “the proposed height, bulk and massing is considered acceptable in terms of design given the variety of building heights in the area”

5.0 Heritage Assets

- 5.1 This section identifies heritage assets which relate to the site. In the case of this application submission, the following heritage assets are local to the proposed development and have been identified as they may be affected by the current proposals. The identification of these assets is consistent with 'Step 1' of the GPA3 The Setting of Heritage Assets.
- 5.2 In the case of this application, the following built heritage assets are located within the vicinity of the Site. Due to their location, positioning and significance, they have the potential to be affected by the proposed development:
1. Rochester Conservation Area;
 2. Jeffrey's Street Conservation Area;
 3. Camden Square Conservation Area;
 4. Camden Broadway Conservation Area;
 5. 108-132 St Pancras Way (Grade II listed);
 6. 11-33 / 22-28 / 4-20 Jeffrey's Street (all Grade II listed, assessed as group);
 7. 8, 9 & 10 Ivor Street (Grade II listed);
 8. Camden Road Station (Grade II listed);
 9. 157 & 159 St Pancras Way and 1 to 6 Rousden Street (all Grade II listed, assessed as group);
 10. 3 Wilmot Place/ 55 Rochester Place (locally listed building);
 11. 189-191 St Pancras Way (locally listed building).

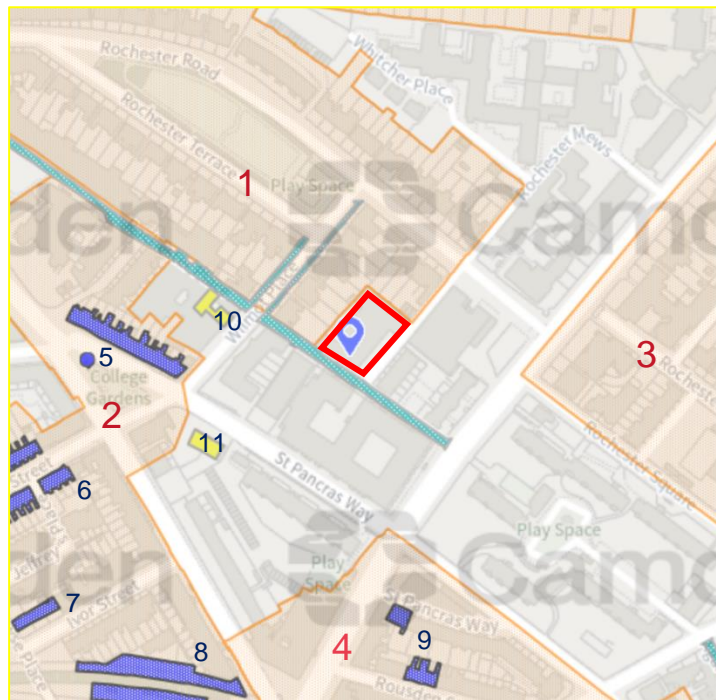


Figure 7 – Map indicating the location of the assets listed above. The site boundary is marked in red, the Conservation Area boundaries in orange; locally listed buildings highlighted yellow and street features light blue; Grade II listed assets shown in purple.

5.3 An in-person visual assessment of the above built heritage assets in conjunction with a desk-based assessment of townscape conditions, determined that due to the location of many of the assets listed above and intervening built form, there is no perceptible relationship with the proposed development Site. For this reason, only the built heritage assets which may be considered to be affected by the proposals have been identified for further assessment, and are limited to the following:

1. Rochester Conservation Area;
2. Jeffrey's Street Conservation Area;
5. 108-132 St Pancras Way (Grade II listed);
10. 3 Wilmot Place/ 55 Rochester Place (locally listed building);

5.4 For the purposes of this assessment, where we consider the Conservation Area(s), we are considering the Conservation Area as a term of designation but also with reference to the built assets which they contain; in other words, we do not assess the Conservation Area in two dimensions but rather as a grouping of buildings and spaces and the manner in which these relate to their surroundings. Thus, consideration of effects on the setting of a Conservation Area also takes into account potential effects on the setting of built assets within that designated area, this includes the buildings which are considered to make a positive contribution to the Conservation Area.

6.0 Significance Assessment

- 6.1 The below evaluation of significance and subsequent conclusions have been assessed in line with the methodology outlined in Section 3 and consider the following:
- The relevant planning legislation as well as the policies set out in the National Planning Policy Framework (NPPF) and objectives of the Planning Practice Guidance;
 - Historic England ‘Conservation Principles: Policies and Guidance’;
 - British Standard 7913 (2013) Guide to the ‘Conservation of Historic Buildings’;
 - Guidance set out in Historic England advice notes.

Rochester Conservation Area

- 6.2 The Rochester Conservation Area was first designated in December 2001. The current Conservation Area Appraisal was also adopted in December 2001.
- 6.3 Rochester is a cohesive and compact Conservation Area that has at its centre the park Rochester Terrace Gardens, giving it a strong focus and sense of definition. The terraces facing onto the gardens were built in the 1840s and 1850s, and benefits from a level of homogeneity and survival which affords it a **good** level of significance in heritage terms.

Contribution of the Site to conservation area

- 6.4 The Site abuts the south-eastern boundary of the conservation area, where the prevailing character changes abruptly from 19th century terraced housing surrounding Rochester Gardens to modern multi-storey developments in office and residential use. There is a clear delineation between the conservation area and the built form representative of its special architectural and historic interest, and the buildings beyond the conservation area’s boundaries which present a wholly different set of characteristics.
- 6.5 As such, the site is considered to make a **neutral** contribution to the setting of the Rochester Conservation Area.

Jeffrey’s Street Conservation Area

- 6.6 The Jeffrey’s Street Conservation Area was first designated in November 1985 and subsequently extended to include a small area to the north-east surrounding Royal College Street in 2002. The current Conservation Area Statement was adopted in November 2002.
- 6.7 The Jeffrey’s Street Conservation Area is primarily focused north of Camden Town Station and around Jeffrey’s Street, with a small segment extending to the north including the St Richard of Chichester RC School and small green space of College Gardens. The area is principally residential, though Camden Town Station, and to a lesser extent the school building, provide prominent punctuation in the streetscene. There is much dilapidated or unsympathetically maintained historic building stock, and elements of plain or discordant buildings from the last half century. It is considered that the Jeffrey’s Street Conservation Area has a **medium/moderate** level of significance in heritage terms.

Contribution of the Site to conservation area

- 6.8 The Site is located beyond the conservation area’s boundaries, approximately 100m to the west at the closest point. There are only limited views from within the conservation area along the narrow Rochester Place which take in the Site. These views out of the conservation area towards the Site are characterised by modern development of up to 7 storeys along the further extent of the lane.
- 6.9 There is a clear delineation between the conservation area’s built form and its character and appearance, and the buildings beyond the conservation area’s boundaries which present a wholly different set of characteristics. The Site is within the wider setting of the conservation area, but in an area of evidently contrasting built form and architectural style.
- 6.10 As such, the site is considered to make a **neutral** contribution to the setting of the Jeffrey’s Street Conservation Area.

108-132 St Pancras Way (Grade II listed);

- 6.11 **108-132 St Pancras Way** is located on the north side of the St Pancras Way, approximately 120m west of the Site. It was added to the Statutory List of Buildings of Special Architectural or Historic Interest on 28 October 1994.
- 6.12 Overall, the terrace at 108-132 St Pancras Way are considered to hold a **moderate/good** level of significance collectively through their surviving design and appearance and their association with the historic development of this part of Camden.

Setting

- 6.13 These buildings are within the Jeffrey’s Street Conservation Area, and have been assessed within a dynamic consideration of the conservation area. The immediate surrounds of the listed 108-132 St Pancras Way (within the northern extent of the Jeffrey’s Street Conservation Area) make a positive contribution to the setting of the listed buildings. As such, the immediate setting of 108-132 St Pancras Way is considered to make a **medium/beneficial** contribution to significance due to the evidence it provides of the historic development of the area. However, the wider setting incorporates buildings of evidently different ages, scales and styles, and **neutral/adverse** contribution to the significance of the assets.

Contribution of the Site to Setting

- 6.14 The application site is located east of the listed 108-132 St Pancras Way, but due to intervening built form share no visual connection with the Site.
- 6.15 Therefore, the Site is considered to make **no** impact on the setting of 108-132 St Pancras Way, making no contribution to its significance.

3 Wilmot Place/ 55 Rochester Place (locally listed building)

- 6.16 **3 Wilmot Place/ 55 Rochester Place** occupies a corner plot on the eastern side of the junction of Wilmot Place and Rochester Place, approximately 70m west of the Site.
- 6.17 From local list: *‘Mews building dating to late 19th century. Has been extended by an additional storey fairly sympathetically, and has suffered alteration including the loss of original windows*

and alteration to carriage entrance on Wilmot Place frontage. Despite this it retains, particularly on Rochester Place frontage, the semi-industrial character which is strongly evident in this stretch of Rochester Place, most of which is within either Jeffrey's Street or Rochester conservation areas.'

- 6.18 Overall, the buildings comprising 3 Wilmot Place/ 55 Rochester Place are considered to hold a **moderate** level of significance through surviving appearance and their association with the historic development of this part of Camden.

Setting

- 6.19 The immediate surrounds of the locally listed 3 Wilmot Place/ 55 Rochester Place make a positive contribution to the setting of the non-designated heritage assets. As such, the immediate setting of the building is considered to make a **medium/beneficial** contribution to significance due to the evidence it provides of the historic development of the area. However, the wider setting incorporates buildings of evidently different ages, scales and styles, and make a **neutral/adverse** contribution to the significance of the assets.

Contribution of the Site to Setting

- 6.20 The application site is located east of the locally listed 3 Wilmot Place/ 55 Rochester Place, but due to intervening built form shares very limited visual connection with the Site, limited to views along the narrow Rochester Place, which ultimately culminate in the array of modern development towards Camden Road which is characterised by built form of contrasting design, form and scale to that of the locally listed building and its immediate surrounds.
- 6.21 Therefore, the Site is considered to make **no** impact on the setting of 3 Wilmot Place/ 55 Rochester Place, making no contribution to its significance.

7.0 Proposed Scheme

7.1 The proposed scheme is for **'two-storey upwards extension to an existing mixed use (residential and office) building to form 10 additional flats'**.

7.2 The following existing and proposed drawings were produced by Tasou Associates Architects and Structural Engineers in August 2022. Images reproduced here are for reference only, please refer to the main drawing for more detailed information.

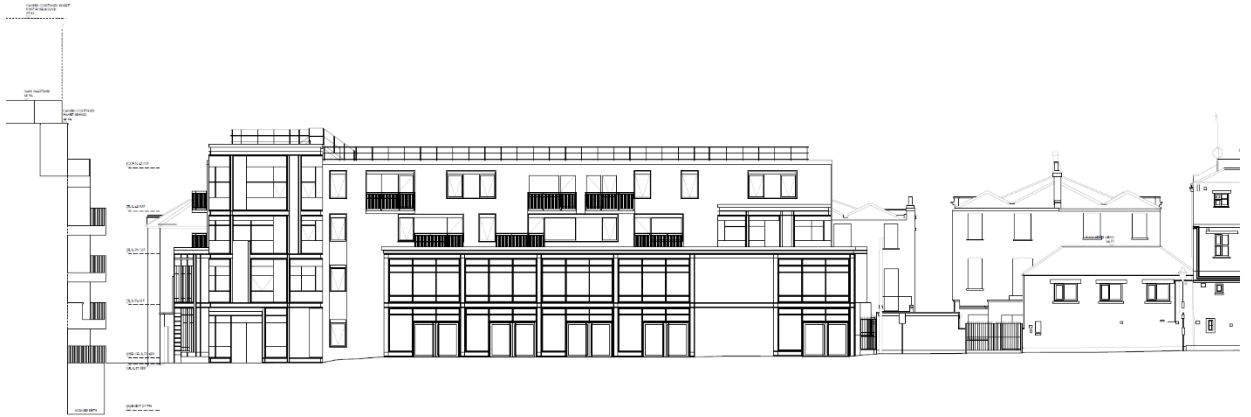


Figure 8 – Existing Rochester Mews elevation



Figure 9 – Proposed Rochester Mews elevation

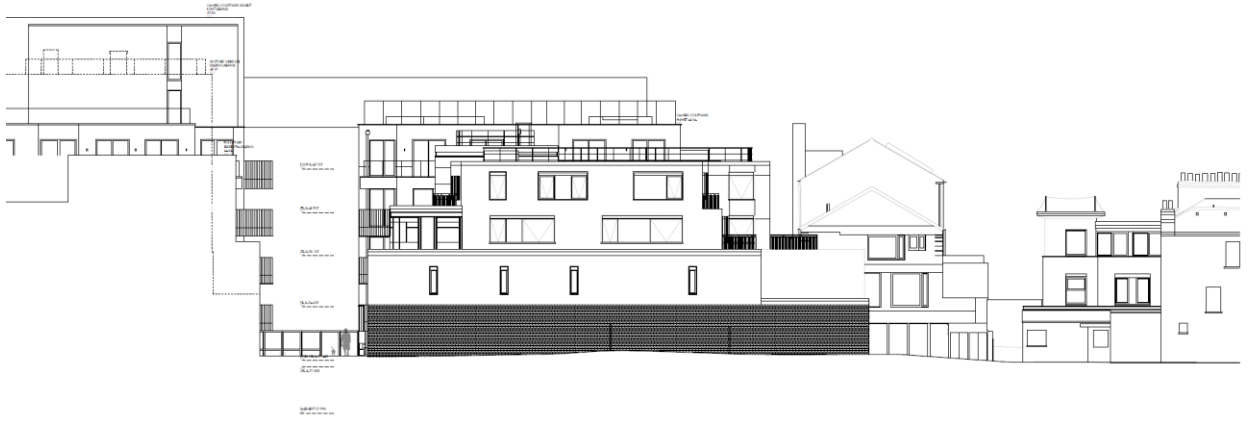


Figure 10 – Existing north-east elevation



Figure 11 – Proposed north-east elevation



Figure 12 – Existing Rochester Place elevation



Figure 13 – Proposed Rochester Place elevation

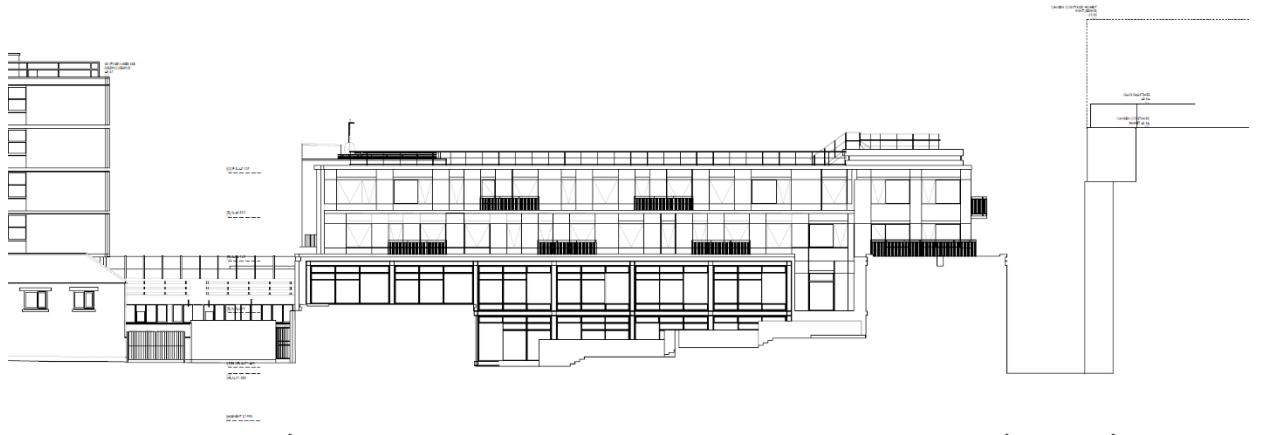


Figure 14 – Existing north-west elevation

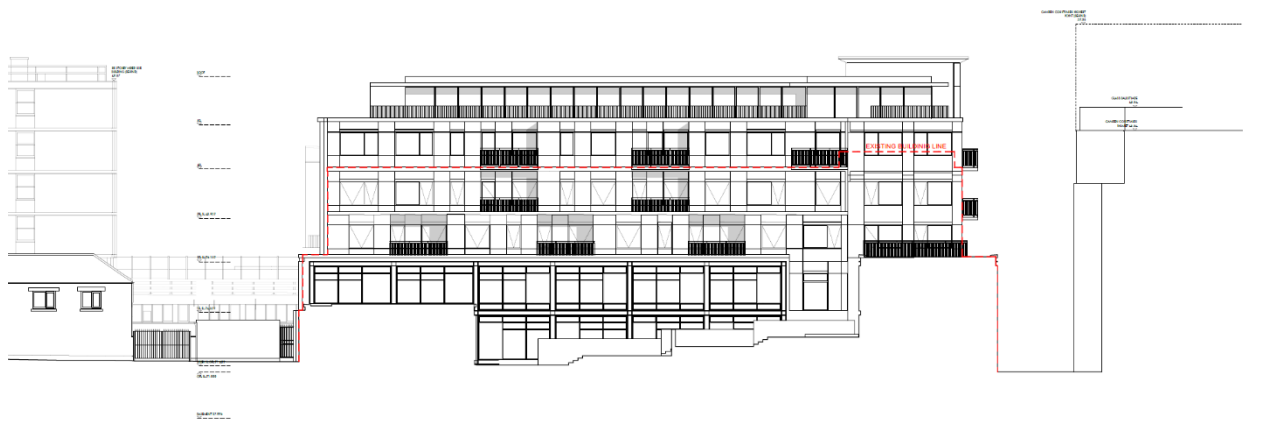


Figure 15 – Proposed north-west elevation

8.0 Impact Assessment

- 8.1 In order to assess the suitability of the site for the proposed development, it is necessary to determine the *nature* and *extent* of any impacts resulting from the proposal on heritage assets and/ or their settings.
- 8.2 When assessing the impact of a proposed development on individual or groups of heritage assets, it is important to assess both the potential, direct physical impacts of the development scheme as well as the potential impacts on their settings and where effects on setting would result in harm to the significance of the asset. It is equally important to identify benefits to settings, where they result from proposals.
- 8.3 The proposed development is considered below in terms of its impact on the significance of the heritage assets, and the contribution which setting makes to their significance. Assessment of impact levels are made with reference to Table 2 in Section 3 and satisfy '**Step 3**' of Historic England's GPA 3.

Rochester Conservation Area

- 8.4 When considering the impact of the proposal for the vertical extension of the existing building on Site upon the Rochester Conservation Area, the location of the Site beyond the boundary of the conservation area is an important factor. The Site is considered to make a neutral contribution to the setting of the conservation area, and the provision of the sensitively designed and high-quality extension in keeping with the context of the site, is considered overall to have a **minor adverse** impact on the contribution that the site makes to the setting of the conservation area. Such a change to the setting would not be overly intrusive or diminish the appreciable context of the asset. Therefore, the scheme is not considered to be in conflict with Section 72 of Planning (Listed Buildings & Conservation Areas) Act 1990, which sets out that special attention shall be paid to the desirability of preserving or enhancing the character and appearance of the Conservation Area.

Jeffrey's Street Conservation Area

- 8.5 When considering the impact of the proposal for the vertical extension of the existing building on Site upon the Jeffrey's Street Conservation Area, the location of the Site well beyond the boundary of the conservation area is an important factor. The Site is considered to make a neutral contribution to the setting of the conservation area, and the provision of the sensitively designed and high-quality extension in keeping with the context of the site, is considered overall to have a **minor adverse** impact on the contribution that the site makes to the setting of the conservation area. Such a change to the setting would not be overly intrusive or diminish the appreciable context of the asset. Therefore, the scheme is not considered to be in conflict with Section 72 of Planning (Listed Buildings & Conservation Areas) Act 1990, which sets out that special attention shall be paid to the desirability of preserving or enhancing the character and appearance of the Conservation Area.

108-132 St Pancras Way (Grade II listed)

- 8.6 This statutory listed terrace grouping is located approximately 120m to the west of the Site. At present, intervening built form prevents any visual connections between the listed buildings and the Site.

- 8.7 The Site is currently considered to have no impact upon the setting of the listed 108-132 St Pancras Way.
- 8.8 Due to the limited awareness of the site, the intervening built form and the relatively low scale of the scheme the proposals will have **no** impact on the setting of the listed terrace.
- 8.9 Therefore, the scheme is not considered to be in conflict with Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990, which sets out the objective of giving special regard to the desirability of preserving the listed building or its setting.



Figure 16 – Oblique view of the Grade II listed 108-132 St Pancras Way (centre of image) with the 5 to 7 storey residential development beyond, which defines a shift in building age/ scale/ design in this context of the building's wider setting.

3 Wilmot Place/ 55 Rochester Place (locally listed building)

- 8.10 This locally listed building is located approximately 70m to the west of the Site. At present, due to intervening built form, there are only very limited visual connections with the Site, limited to views along the narrow Rochester Place, which ultimately culminate in the array of modern development towards Camden Road which is characterised by built form of contrasting design, form and scale to that of the locally listed building and its immediate surrounds.
- 8.11 The Site is currently considered to have no impact upon the setting of the locally listed 3 Wilmot Place/ 55 Rochester Place

- 8.12 Due to the limited awareness of the site, the intervening built form and the relatively low scale of the scheme the proposals will have a **neutral/ minor adverse** impact on the setting of the locally listed building.
- 8.13 In the case of non-designated heritage assets, Paragraph 203 of the NPPF requires a Local Planning Authority to make a “*balanced judgement*” having regard to the scale of any harm or loss and the significance of the heritage asset. The negligible change to the wider setting of this NDHA will not result in any material impact affecting the special interest of the building.



Figure 17 – The locally listed building, 3 Wilmot Place/ 55 Rochester Place, to right of image. There has been evident rebuilding to upper storeys. The building directly opposite on Wilmot Place has a starkly modern vertical extension, and other modern development around the application Site characterises the existing wider setting of the asset. The Site is identified with a red arrow.

9.0 Conclusions

- 9.1 This Heritage Statement has been produced by Bidwells on behalf of Breeze Holdings in relation to the proposed vertical extension at 26-28 Rochester Place.
- 9.2 The proposals seek to deliver a ‘two-storey upwards extension to an existing mixed use (residential and office) building to form 10 additional flats’.
- 9.3 This report considers the impact of the proposed scheme on the significance of the built heritage assets identified, including the contribution made by their settings. This approach to impact-assessment is required in order to satisfy the provisions of Sections 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act of 1990 in relation to listed buildings and the National Planning Policy Framework (NPPF) where the impact of development on heritage assets or their settings is being considered (Paragraphs 194-206).
- 9.4 As a result of our assessments on site, it is considered that the proposed scheme would result in impacts ranging from **no impact** on the setting of the Grade II listed 108-132 St Pancras Way terrace and a **minor adverse** impact on the setting of the Rochester Conservation Area and Jeffrey’s Street Conservation Area.
- 9.5 The aspects of harm identified are considered, in all cases, to represent “*less than substantial*” harm in the context of Paragraph 202 of the NPPF. In these instances, we consider that the “*less than substantial*” harm levels **are at the very low end** of this scale and would not incur impacts of such an effect as to infer substantial losses of significance by way of impact on setting.
- 9.6 With regard to 3 Wilmot Place/ 55 Rochester Place, Paragraph 203 requires a balanced judgement to be undertaken when considering impacts on non-designated assets. The **neutral/ minor adverse** impact to this NDHA is limited to the asset’s setting, which is considered to make contributions ranging from medium/ beneficial to neutral/adverse for immediate and wider setting respectively. The application Site is considered to fall in the wider setting of the asset.
- 9.7 We therefore find that the proposed development to have had special regard for the desirable objective of preserving the special interest of the Grade II listed building 108-132 St Pancras Way and its setting in accordance with Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 and have paid special attention to the desirability of preserving or enhancing the character or appearance of the Rochester Conservation Area and Jeffrey’s Street Conservation Area in accordance with Section 72(1). In addition to satisfying these provisions of the Act, the NPPF Paragraphs 194-206 are also satisfied.

APPENDIX 1

STATUTORY LIST DESCRIPTION

108-132 St Pancras Way (Grade II listed)

List entry number 1245848. Date first listed: 28 October 1994

Terrace of 13 houses, 4 with shops. Mid-1820s. Stock brick and stucco, slate roofs. EXTERIOR: 3 storeys and basements, No.112 with added mansard storey not of special interest. Each house is 2 windows wide except for No.108 (one window wide), with doors to right reached up steps over basement areas; the end houses with entrances on side returns. Stuccoed ground floors and basements with banded rustication treated as keystones over openings. A hierarchy of 12- and 8-light glazing bar sashes to the upper windows. The ground floors have always had a variety of fenestration, with margin lights to No.120 and round-arched windows to the remainder, Nos 114 and 130 with 12 lights and central round-arched glazing bars. Nos 116 and 122 with modern casement windows of no interest. Original doors except to No.122. All doorcases with engaged, fluted pilasters and semicircular toplights, No.130 with decorative fanlight, save Nos 108, 110, 112 and 132 which have shopfronts. Those to Nos 108 and 132 of particular interest as early C19 examples, with corner entrances. No.108 has moulded eaves cornice, deep frieze, engaged unmoulded pilasters and small panels under 6- and 4-light windows, these with thin mullions and central transoms. That to No.132 has simpler cornice and sides, but 12 and 10 smaller panes between slender glazing bars, and margin lights to top; square top-light over modern door at corner. Shopfront to No.114 with pleasant early C20 margin-light decoration to top, and contemporary door. INTERIORS not inspected but many are noted to retain original cornices and shutterboxes as well as staircases. SUBSIDIARY FEATURES: spearhead railings to basement areas and entrance steps in the properties without shopfronts. This terrace forms a strong and cohesive piece of townscape seen across College Green.

11-33 Jeffrey's Street (Grade II listed)

List entry number 1379153. Date first listed: 14 May 1974

Terrace of 12 houses. Early C19. End houses (Nos 11 & 33) and centre houses (Nos 21 & 23) stucco with rusticated ground floors; other houses yellow stock brick (upper floors mostly refaced) with stucco ground floors and 1st floor band. 3 storeys and basements. 2 windows each except end and centre houses with 1 window each. Round-arched ground floor openings except windows of end and centre houses being segmental-arched sashes. Doorways with reeded surrounds, radial or patterned fanlights and mostly panelled doors. Ground floor sashes mostly with margin glazing. End and centre houses upper floors with segmental-arched tripartite sashes; 1st floors with cast-iron balconies. Others houses with gauged brick flat arches to recessed casements with cast-iron balconies on 1st floors; 2nd floors, segmental-arched recessed sashes. Parapets; centre houses with blocking course. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas.

22-28 Jeffrey's Street (Grade II listed)

List entry number 11379154. Date first listed: 14 May 1974

Terrace of 4 houses. Early C19, altered. Yellow stock brick with some refacing; stucco ground floors, Nos 22 & 24 rusticated). Plain 1st floor band. 3 storeys and basements. 2 windows each. Square-headed doorways with fanlights and panelled doors. Recessed sashes; ground floors with margin glazing, 1st floors with cast-iron balconies. No.22 with stuccoed lintels and casements to 1st floor. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with foliated finials to areas.

4-20 Jeffrey's Street (Grade II listed)

List entry number 1379152. Date first listed: 14 May 1974

Includes: No.10 PROWSE PLACE. Terrace of 10 houses. Early C19. Yellow stock brick (2nd floors mostly refaced) and stucco ground floors (Nos 12-20 rusticated) with 1st floor band. No.20 cement faced. 3 storeys and basements. 2 windows each. Round-arched ground floor openings. Doorways with cornice-heads; Nos 4, 6 and 10 with fluted quarter columns, fanlights (No.20 patterned, No.6 with intersecting tracery) and panelled doors. C20 entrance to No.10 Prowse Place. Recessed sashes to ground floors, Nos 6, 12, 14 & 20 with intersecting tracery. Upper floors with segmental arches to recessed sashes except Nos 8-14 with stuccoed flat arches. No.18 with all C20 glazing. All with cast-iron balconies to 1st floor windows. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn or acorn finials to areas. No.10 Prowse Place was listed on 30/01/76 (formerly No.2 Jeffrey's Street).

8, 9 & 10 Ivor Street (Grade II listed)

List entry number 1271742. Date first listed: 11 Jan 1999.

Terrace of three houses. 1836-7. Stuccoed brick, tiled roofs. Double fronted, three-bay houses with central doors; two storeys high. Parapets, with recessed panels to Nos. 9 and 10; Nos. 8 and 9 with moulded cornices; all with protruding first floor band. All windows have galzing bar sashes in moulded architrave surrounds. Doorcases with floreate roundels and hoods on console brackets, the latter to No.8 renewed. All with three-panel rectangular toplights, Nos. 9 and 10 with six-panel doors. INTERIORS not inspected.

Camden Road Station (Grade II listed)

List entry number 1244154. Date first listed: 11 January 1999.

Includes: No.223 Camden Road Station ROYAL COLLEGE STREET. Includes: Nos.13-23 Camden Road Station BONNY STREET. Station. 1870. By EH Horne. For the North London Railway. Yellow stock brick with stone dressings. EXTERIOR: 3 storeys. Single bay entrance front on angle between Camden Road and Bonny Street: arched opening with lunette of circular tracery within gauged arch, dentil cornices at first and second floor level, parapet. Camden Road elevation contains shopfront on ground floor set below 2 brick arches; granite drinking fountain in form of a pylon to north, below railway bridge; parapet inscribed in sunken letters CAMDEN TOWN STATION. Bonny Street elevation: 4 arched windows per floor, with herringbone brick infills to first storey lunettes over stone mullions; parapet has panel inscribed in sunken letters NORTH LONDON RAILWAY. The station complex continues west along Nos 13-19 Bonny Street with offices and former waiting rooms above goods stores, all faced in the same yellow brick, with arched windows and stone mouldings. Royal College Street elevation: projecting Classical arched entrance with a pair of four-panel doors below fanlight; cornice has guttae of cut brick. INTERIOR: triangular booking hall has coffered roof with central cast-iron column. Booking office

inserted 1984 replacing earlier, and of no interest. Original stairs with cast-iron rails leading up to both platforms. West-bound platform retains its projecting canopy supported on cast-iron columns with ornamental spandrels. HISTORICAL NOTE: this station was opened in December 1870, replacing an earlier station of 1850 on a different site. It is the only survivor of the Italianate brick station buildings erected in the 1870s along the North London Railway to replace the original wooden buildings of the line, and one of the few suburban stations of the period to survive in London. The extent of the ancillary buildings along Bonny Street suggests that this was a busy station of some prominence. Renamed Camden Road station in 1950, the station was refurbished in 1984 by British Railways and the Greater London Council. (Buck G: A Pictorial Survey of Railway Stations: London: -1992: 154-155; National Railway Museum: North London Railway. A Pictorial Record: York: -1979).

157 & 159 St Pancras Way (Grade II listed)

List entry number 1245851. Date first listed: 14 May 1974.

2 terraced houses. Early C19. Stucco with rusticated ground floors. 3 storeys and basements. 2 windows each. Round-arched ground floor openings with keystones; No.159 currently boarded and bricked up. No.157 doorway with fluted quarter columns, fanlight and panelled door. Windows with cast-iron guards. 1st floor casements round-arched with architraves to heads linked by impost bands; cast-iron balconies. Square-headed, architraved sashes to 2nd floors. Cornice and parapet. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with acorn finials to areas.

1-6 Rousden Street (Grade II listed)

List entry number 1130402. Date first listed: 14 May 1974.

Terrace of 6 almshouses (numbering of street altered so that 15 includes what was Nos 13, 14 & 16). Early C19, altered late C20. Stucco in Gothick style. 3 storeys. 8 windows. 4 doorways with chamfered reveals, overlights with pointed lights and panelled doors. Square-headed sashes with chamfered reveals and pointed lights; ground floor with linked drip moulds carried over doorways; 1st floor with sill string and drip moulds; 2nd floor with drip moulds. Parapet. INTERIORS: not inspected.



BIDWELLS