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Paula Jones Authored By:

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Introduction 1.

- 1.1 This Heritage Impact Assessment has been written and prepared by HCUK Group on behalf of Firethorn Property Holdings Ltd. It relates to a grade II listed building known as Vernon House, built circa 1860.
- 1.2 Vernon House was listed grade II on 14 May 1974. The site in question comprises numbers 5, 6, 7 and 8 of the terrace on St. Mark's Square, and it should be noted that numbers 9, 10 and 11 St. Mark's Square were also part of Vernon House until 1996 at which point they were returned to use as single dwellings. The listed building is officially described as follows (the listing description has not been updated since 9, 10, 11 St. Mark's Square were returned to use as single dwellings):

"Terrace, formerly of 8 houses, now converted to one building. c1860, altered. Stucco with rusticated ground floor and quoins. 4 storeys and basements; projecting end bays, left hand with extra attic storey. Symmetrical facade of 13 windows and 3-window left hand return. Prostyle Doric porticoes with dentil entablatures continuing across and around the buildings; doorways of former Nos 5 (on left return), 6 and 10 with pilaster-jambs carrying cornice heads, sidelights, fanlights and half glazed doors. Other doorways converted to windows. Tripartite ground floor sashes, most with cast-iron window quards; projecting left hand bay with canted bay window and cast-iron window guard. 2nd floor sashes architraved with console bracketed segmental pediments and continuous cast-iron balconies; projecting left hand bay with canted bay window and balcony. 2nd floor, architraved sashes with console bracketed cornices; 3rd floor, architraved sashes with keystones. Projecting left hand bay with tripartite sashes to 3rd, 4th and attic storeys; 2nd floor with console bracketed cornice. Simplified dentil entablature with console bracketed cornice and blocking course. INTERIOR: not inspected."

1.3 The terrace stands opposite St. Mark's Church, a grade II listed church built 1851-2, with mid-20th century interiors. There are a number of listed buildings in the vicinity of 5-8 St. Mark's Square. These comprise (all grade II): 16 Prince Albert Road, 17-22 Prince Albert Road, 1 St. Mark's Square, 2 and 3 St. Mark's Square, and 36 Regents Park Road - all of which are stucco fronted mid-19th century semidetached villas. Number 10 Regents Park Road was designed by Erno Goldfinger, and constructed in 1954-56 on a mid-terrace bomb damage site. The Grafton



Bridge over the Grand Union Canal is another grade II listed asset in the vicinity of the site in question.

- 1.4 The site in question is predominantly surrounded by other housing of a similar age and style. To the south of the site is St. Marks Church, and to the east (next to number 11 St. Mark's Square) is the Grand Union Canal.
- 1.5 The site is within the Primrose Hill Conservation Area.
- 1.6 This report has been prepared to accompany an application for the re-opening of three (now) internal blocked-up windows on the ground floor of Vernon House as part of the creation of additional, more generous communal / break-out space to significantly improve the space offering for the existing hostel accommodation, for which a planning application and Listed Building Consent application will be submitted.
- 1.7 This report seeks to address the alterations above and confirm that they would not make any impact on the special interest of the building. This heritage assessment describes the significance of the heritage assets and assesses the potential impact of change on their significance.
- 1.8 Numerous site visits have been undertaken by HCUK throughout 2018 and 2019, the most recent on 17 July 2019. HCUK have completed a number of other supporting documents for both internal and external changes to Vernon House, and as such have a robust familiarity with the site.
- 1.9 A pre-application consultation was undertaken prior to the submission of the application in April 2023 (Ref: 2023/0578/PRE). The response provided by Camden Council confirmed that:

"The architectural significance of Vernon House is now invested solely in the external detailing of the building and the contribution the terrace makes to the character and appearance of the conservation area.

The proposed internal alterations are further changes to recent alterations. The proposed changes are not considered to cause further harm to the significance of the building."



Relevant Planning Policy Framework 2.

- 2.1 The decision maker is required by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possess. There is a strong presumption against the grant of permission for development that would harm the listed building, though the presumption will plainly be lessened if the harm is less than substantial within the meaning in the National Planning Policy Framework (NPPF) as is explained further below.
- 2.2 Harm is defined by Historic England as change which erodes the significance of a heritage asset.1
- 2.3 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 setting of the heritage asset can also 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."

2.4 The NPPF requires the impact on the significance of a 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. The Scale of Harm is tabulated at Appendix 1.

¹ Paragraph 84 of Conservation Principles 2008.



- 2.5 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. 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:
- 2.6 Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.
- 2.7 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.
- 2.8 This assessment is confined to the significance of the heritage assets and the impact of change on that significance. It does not address the planning balance in which public benefit is weighed against the degree of harm, if any.
- 2.9 In the Camden Local Plan the policy relating to the alteration of listed buildings is summarised below:

Policy D2(j) states the Council will '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'.



3. Statement of Significance

Introduction

3.1 This chapter of the assessment identifies the significance of the designated heritage assets according to the guidelines in the National Planning Policy Framework (NPPF).

Vernon House, 5-8 St. Mark's Square, London.

- 3.2 Vernon House (5-11 St. Mark's Square) was listed grade II on 14 May 1974. The list description has not been updated to reflect the subdivision and conversion of numbers 9-11 as single dwellings.
- 3.3 In 1840 the Southampton Estate was sold in freehold parcels for development. The sale map shows the expectation for a grand estate populated by detached and semi-detached villas in generous gardens. This layout is largely reflected in the street pattern of the area at present, though with a greater range of accommodation types than first drafted on the sale map.
- 3.4 Detached and semi-detached villas were the most common building types of the late 1840s, but the 'grand terrace compositions' (such as 5-11 St. Mark's Square) incorporated a density that had not originally been envisaged for the area. By 1870 the estate was almost completely developed.
- 3.5 When it was first built the terrace would have consisted of basement level plus four floors. It is not clear whether the mansard roof accommodation is original or a later addition. The dormer window frames at fourth floor date to the mid-20th century.
- 3.6 Until the electrification of the nearby railway line in the 1970s, the area had a poor environmental quality, and demand for grand residences was not as high as it had been. Accordingly, many large single dwellings were converted into multiple residences. The record of conversion for Vernon House has not been located, but it



probable that at the time of these works, the mansard roof extension was also added.

- 3.7 Architectural interest: Vernon House was built circa 1860, at a period of rapid development in the area. Originally built as a terrace of 7 houses, following the prevailing local use of stucco, with rusticated ground floor and quoins. The building is 5 storeys high (one of which is in the mansard roof) and basements; the projecting western end bay has an extra attic storey. The façade is symmetrical with 13 windows and a 3-window left hand return. The entries are emphasised with Prostyle Doric porticoes with dentil entablatures which continue across and around the buildings. The doorways of number 5 (on left return), 6 and 10 have the best surviving examples of pilaster-jambs carrying cornice heads, sidelights, fanlights and half glazed doors among the terrace. The ground floor windows are tripartite sashes, most with original cast-iron window guards. The projecting left hand bay has a canted bay window and cast-iron window guard. The second floor sash windows are architraved with console bracketed segmental pediments and continuous cast-iron balconies; with the projecting left hand bay with canted bay window and balcony. The third floor windows are architraved sashes with keystones. The projecting left hand bay features tripartite sashes to third, fourth and attic storeys; while the second floor has a console bracketed cornice. The interiors have been substantially altered in the process of reconfiguration, with the original floor plan largely illegible through many modern partitions dividing the original room volumes, and suspended ceilings featuring prominently throughout the building. The building is visually distinctive as a large, complete terrace running between Princess Road and the Grand Union Canal. The decorative detail on the exterior adds interest, however it is not so unique as to possess more than a moderate amount of aesthetic interest.
- 3.8 Historic interest: Vernon House has not been attributed to a particular architect. There is an illustrative link to the morphology of the area, as the 'grand terrace' model is a clear departure from the previously popular detached and semi-detached villas of the area in the 1840s-1850s. This illustrates the changing perspectives on density in the 19th century and also how the area has developed over time. The



- history of conversion and re-conversion of the building shows how the site has changed over time, and how attitudes to the area have also changed.
- 3.9 Artistic interest: The building is not directly associated with any artist or artistic movement of note, and therefore possesses no intrinsic artistic interest.
- 3.10 Archaeological interest: Vernon House is not of intrinsic archaeological interest.
- 3.11 Initial assessment of significance: Vernon House is of special architectural and historic interest. Its significance is largely derived from its principal front elevation and contribution to the local street-scene. Internally, there is little remaining original detail, and even the plan form has been consistently obscured throughout. It retains its historical value and is of medium significance.

Primrose Hill Conservation Area

- 3.12 5-8 St. Mark's Square falls within the boundary of the Primrose Hill Conservation Area. The conservation area was designated in October 1971, and extended in June 1985. The conservation area statement was adopted in December 2000. The conservation area is divided into four sub-areas, of which the site in question is in sub-area 1: Regent's Park Road South.
- 3.13 The conservation area is generally residential in character, comprising a series of well laid out Victorian terraces. It is punctuated with local industries, shops and pubs.
- 3.14 Sub-area 1 of the conservation area is largely flat, with a small incline from southeast to north-west. It is neighboured to the west by Primrose Hill, and bounded on the south by Regents Park and London Zoo, Regent's Canal to the north-west and the railway line to the north. The sub-area is characterised by Italianate Villas lining principal streets, with generous set-backs and mature street trees giving the area a leafy character. Three to four storey Italianate villas are the primary typology in the area, with raised ground floors and numerous decorative features. The villas are generally semi-detached or in terraces, and most commonly have stucco fronts, rusticated on lower floors.



3.15 St. Mark's Square is referred to in the conservation area statement as one of two 'grand terraces' in the area, and makes a positive contribution to both the immediate street-scene and wider conservation area.



Heritage Impact Assessment

Introduction

4.1 This chapter of the report assesses the impact of the proposals on the significance of the heritage assets identified in the previous chapter. This report should be read in conjunction with the Design and Access Statement.



Figure 1: Existing blocked-up internal windows

Impact Assessment

4.2 The proposed works to the listed building are limited to the re-opening of three (now internal) windows which are currently blocked-up (see Figure 1, above) as part of the creation of additional, more generous communal / break-out space to



significantly improve the space offering for the existing hostel accommodation on the ground floor of Vernon House. The location within the ground floor, the location of the internal windows, and the proposed layout of the new public area is shown below on Figure 2. It is proposed to reopen all three window and to extend the one window down to the floor level to create a new doorway.

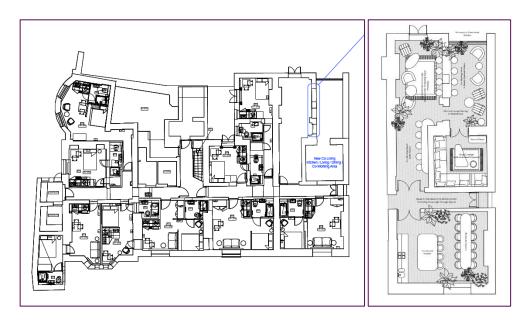


Figure 2: Location of the proposed public area (left) and new decorative layout (right)

Effects on the core constituents of significance

- 4.3 Impact on Architectural interest: The reopening of the three blocked up internal windows, and the extension of one window down to the level of the floor, will have no impact on the special architectural interest of the property.
- 4.4 Impact on Historic interest: The wholly minor proposed changes will not affect the historic interest of the building. Vernon House has a history of conversion and reconversion over time, reflecting the ways in which attitudes to the area and lifestyle have also changed.
- 4.5 Impact on Artistic interest: Vernon House is not of intrinsic artistic interest, and there will therefore be no effect on artistic significance.



- 4.6 Impact on Archaeological interest: Vernon House is not of archaeological interest, and there will therefore be no effect on archaeological significance.
- 4.7 Overall, the proposals are considered to preserve the special character and appearance of the listed building as well as the conservation area and will not pose any harm to the significance of these designated heritage assets.



5. Conclusion

- 5.1 The report accords with paragraph 194 of the NPPF insofar as it provides a proportionate assessment of the significance of designated heritage assets affected by the changes, and assesses the impact of the changes upon the heritage asset.
- 5.2 Built circa 1860 the building was part of the rapid development of Primrose Hill at the time, brought on in part by the presence of the railway terminating at Euston and by sale of land from the Southampton Estate. The building used the popular stucco finish of the area, but was one of the 'grand terraces' which diverged from the more prevalent detached and semi-detached typology which initially characterised the area.
- 5.3 The building is typical of many in the area which could not sustain use as a single family dwelling, and was therefore divided into multiple accommodation. The fact that three of the seven buildings were returned to single family dwellings in 1996 shows the changing favour of the area over time. Its changes of use have resulted in significant alterations and the loss of interior details and legibility of original plan form.
- 5.4 Within the above context, the very minor alterations as described in Chapter 4 are not considered to pose any harm to the significance of the building or to the character and appearance of the conservation area.
- 5.5 The effect of the proposed alterations to the building are considered to pose **no harm** for the purposes of policy D2(j) of the Camden Local Plan.
- 5.6 Given the negligible impact of change through the reopening of the internal windows and extension of one window to floor level, it is concluded that the architectural and historical significance of the building is preserved, and there will be **no harm** to the significance of the listed building overall.
- **5.7** There will be no impact upon the surrounding heritage assets, including the Primrose Hill Conservation Area.



5.8 Following a pre-application consultation (Ref: 2023/0578/PRE) Camden Council also confirmed that they were in agreement with the conclusions reached within the Preapplication Heritage Impact Assessment (HCUK, January 2023) that:

> "The architectural significance of Vernon House is now invested solely in the external detailing of the building and the contribution the terrace makes to the character and appearance of the conservation area.

The proposed internal alterations are further changes to recent alterations. The proposed changes are not considered to cause further harm to the significance of the building."

5.9 In conclusion, the changes are considered to be informed and appropriate. They will not result in any harm within the meaning in paragraphs 199 to 202 of the NPPF, and preservation for the purposes of the duty in section 16(2) of the Act.



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).²

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		
	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.		
Less than	Medium level harm, not necessarily serious to the significance of		
Substantial Harm	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

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² 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.



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

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