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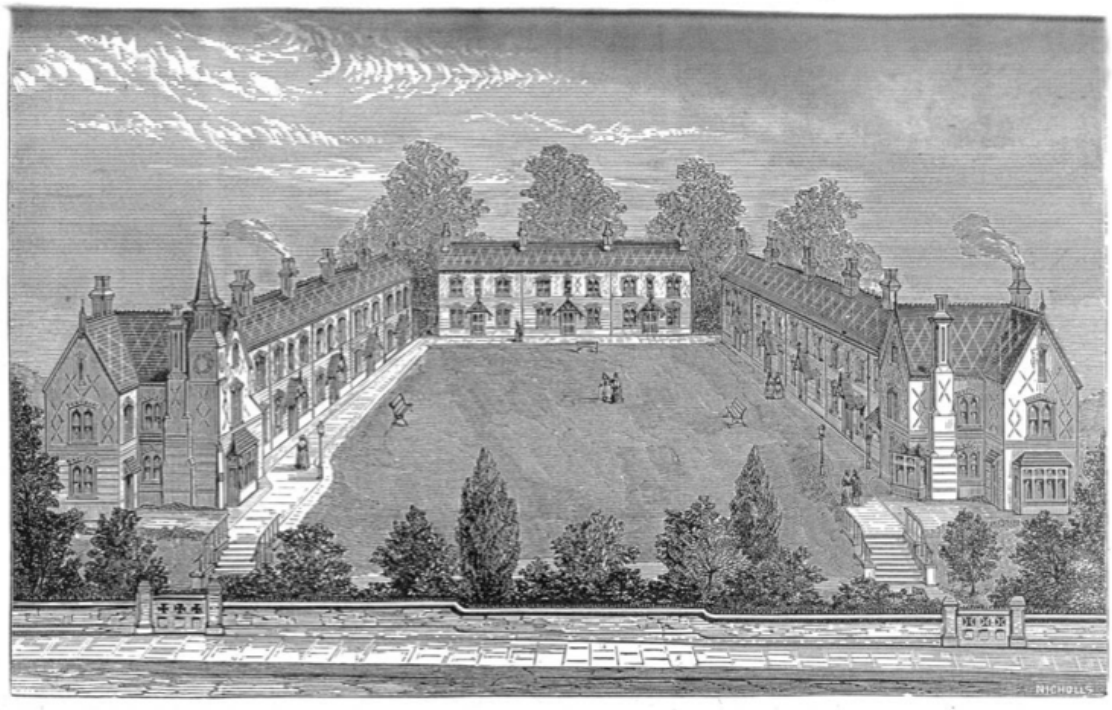
St Pancras Alms Houses

Heritage Impact Assessment

Revised June 2023



This supporting statement forms part of a Planning/Listed Building Application and is accompanied by the following documents:

Design and Access Statement

Existing situation:
SPA 200 Location plan 1:1250.pdf
SPA 201 Site Plan 1:200 A2.pdf
SPA 202 Roof Plan 1:200 A2.pdf
SPA 203 North Range Ground Floor Plan 1:100 A2.pdf
SPA 204 North Range First Floor Plan 1:100 A2.pdf
SPA 205 North Range Front and Rear Elevations 1:100 A2.pdf
SPA 206 West Range Ground Floor Plan 1:100 A2.pdf
SPA 207 West Range First Floor Plan 1:100 A2.pdf
SPA 208 West Range Front and Rear Elevations 1:100 A2.pdf
SPA 209 South Range Ground Floor Plan 1:100 A2.pdf
SPA 210 South Range First Floor Plan 1:100 A2.pdf
SPA 211 South Range Front and Rear Elevations 1:100 A2.pdf
SPA 212 Guest Accommodation Plan 1:50 A3.pdf
SPA 213 Guest Accommodation Section AA 1:50 A3.pdf
SPA 214 Guest Accommodation Side Elevation 1:50 A3.pdf
SPA 215 Guest Accommodation Rear Elevation 1:50 A3.pdf
SPA 216 Hall Plan 1:50 A3.pdf
SPA 217 Hall Section AA 1:50 A3.pdf
SPA 218 Hall Section BB 1:50 A3.pdf
SPA 219 Hall Elevation South 1:50 A3.pdf
SPA 220 Hall Elevation West 1:50 A3.pdf

Drawings of proposed works:
SPA 301 Site Plan 1:200 A2.pdf
SPA 302 Roof Plan 1:200 A2.pdf
SPA 303 North Range Ground Floor Plan 1:100 A2.pdf
SPA 304A North Range First Floor Plan 1:100 A2.pdf
SPA 305A North Range Front and Rear Elevations 1:100 A2.pdf
SPA 306 West Range Ground Floor Plan 1:100 A2.pdf
SPA 307A West Range First Floor Plan 1:100 A2.pdf
SPA 308A West Range Front and Rear Elevations 1:100 A2.pdf
SPA 309 South Range Ground Floor Plan 1:100 A2.pdf
SPA 310A South Range First Floor Plan 1:100 A2.pdf
SPA 311A South Range Front and Rear Elevations 1:100 A2.pdf
SPA 312 Guest Accommodation Plan 1:50 A3.pdf
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SPA 314 Guest Accommodation Side Elevation 1:50 A3.pdf
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SPA 319 Hall Elevation South 1:50 A3.pdf
SPA 320 Hall Elevation West 1:50 A3.pdf
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SPA 322 Hall Details Proposed 1:10 A1.pdf

St Pancras Alms Houses

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1 Introduction

Scope

A practical conservation-led design requires knowledge of the physical condition and structural integrity of an asset, to complement an assessment of its significance. Following from this work it is possible to understand the impacts of proposals on significance and to ensure that any negative consequences are avoided or mitigated as fully as possible.

This **Heritage Impact Assessment** seeks to clarify the impacts of these proposals on the historic significance of the building. It covers alterations to the existing Laundry to extend the guest accommodation available to all residents of St pancreas Alms Houses, alterations to the public Hall which through the presence of a stage, inadequate heating and inconvenient kitchen facilities is virtually unused, and the implementation of a renewable energy strategy to the accommodation units providing insulation, heat recovery ventilation, Air-Source Heat Pump (ASHP) driven low temperature under-floor heating and a dedicated solar PV provision to offset potentially ruinous energy costs.

This report provides an assessment of the heritage significance of the subject property and above ground heritage assets (buildings, structures and areas of heritage interest) within the area of the proposed scheme. Professional expert opinion has been used to assess heritage significance, based on historic, archaeological, architectural or artistic interest, and the heritage values set out in Historic England Conservation Principles (2008). The report provides a heritage impact assessment of the proposed scheme. Where relevant, it also considers the contribution of setting to the significance of designated assets both for the subject property and within the study area (e.g. views to and from listed buildings and conservation areas). This Heritage Statement does not address buried heritage assets (archaeological remains).

Aims and Objectives

The aim of this report is to assess the impact of the proposed scheme and to provide a suitable strategy to mitigate any adverse effects, if required, as part of a planning application. The aim is achieved through six objectives:

- identify the presence of any known or potential heritage asset that may be affected by the proposals;
- describe the significance of such assets, in accordance with the National Planning Policy Framework (NPPF), taking into account factors which may have compromised an asset's survival or significance;
- determine the contribution to which setting makes to the significance of any sensitive (i.e. designated) heritage assets;
- assess the likely impacts upon the significance of the asset(s) arising from the proposals,
- assess the impact of the proposed scheme on how designated heritage assets are understood and experienced through changes to their setting;
- provide recommendations for further investigation and/or mitigation where required, aimed at reducing or removing any adverse effects.

2 Methodology and Sources

This Heritage Statement has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (MHCLG 2021) and to standards and guidance produced by Historic England (HE) and the Institute of Historic Buildings Conservation (IHBC). The British Standard: Guide to the Conservation of Historic Buildings 7913:2013 (BS 2013) has also been used to inform this Heritage Statement.
In addition to the above, the proposed scheme will be assessed in relation to its compliance with the following principal sources:

The Planning (Listed Building and Conservation Areas) Act 1990
Planning Practice Guidance (PPG)
Conservation principles, policies and guidance for the sustainable management of the historic environment, Historic England, April 2008
Historic Environment Good Practice Advice in Planning, Historic England, March 2015: Planning Note 1: The Historic Environment in Local Plans
Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
Local Planning Policy and Guidance

Assessing Heritage significance

The NPPF (Annex 2) defines a heritage asset 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. Heritage assets include designated heritage assets and assets identified by the local planning authority (i.e through local listing)."*

The framework (NPPF Annex 2) goes onto define significance as: "The *value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*

Historic Interest: the way in which an asset can illustrate the story of past events, people and aspects of life (illustrative value, or interest). It can be said to hold communal value when associated with the identity of a community.

Archaeological Interest: the potential of an asset to yield evidence of past human activity that could be revealed through future investigation. Archaeological interest includes above ground structures, as well as earthworks and buried or submerged remains.

Architectural and Artistic Interest: derives from a contemporary appreciation of an asset's aesthetics. Architectural interest is an interest in design, construction, craftsmanship and decoration of buildings and structures. Artistic interest can include the use, representation or influence of historic places or buildings in artwork. It can also include the skill and emotional impact of works of art that are part of heritage assets or assets in their own right.

These values encompass the criteria that Historic England are obliged to consider when statutorily designating heritage assets. No single criterion is used to define what the overall significance of an asset is; each asset has to be evaluated against the range of criteria listed above on a case-by-case basis. These values are not intended to be restrictive but are identified in order to help establish a method for thinking systematically and consistently about the heritage values that can be ascribed to a place and contribute to a heritage asset's significance.

In addition to the above, Historic England's document 'Conservation Principles – Policies and Guidance for the sustainable management of the historic environment' (HE, 2008) identifies a series of values that can be attributed to a heritage asset, and which help to appraise and define its significance. Paragraph 3.3 of the document outlines that:

"In order to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:

who values the place, and why they do so;
how those values relate to its fabric;
their relative importance;
whether associated objects contribute to them;
the contribution made by the setting and context of the place;
how the place compares with others sharing similar values."

Section 4 (HE. 2008): Understanding Heritage Values, presents a framework against which a range of inter-related heritage 'values' can be considered and used to establish what attributes contribute to the significance of a place. It identifies four categories of heritage value, these are: evidential, historical, aesthetic and communal. 'Significance is a collective term for the sum of all the heritage values attached to a place'. The following definitions of heritage value are adopted:

Evidential value
"Evidential value derives from the potential of a place to yield evidence about past human activity... Physical remains or the genetic lines that had been inherited from the past are a 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" (Conservation Principles, Para 35, 36 and 38).

Historical value
"Historical 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." (Conservation Principles, Para 39).

"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." (Conservation Principles, Para 44).

Aesthetic value
"Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place". (Conservation Principles, Para 46).

"Aesthetic values can be the result of 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 be 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." (Conservation Principles, Para 47).

"Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. The embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship." (Conservation Principles, Para 48). *"The value of the artwork is proportionate to the extent that it remains the actual product of the artist's hand."* (Conservation Principles, Para 50).

Communal value
"Communal value, derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical value, but tend to have additional and specific aspects" (Conservation Principles, Para 54).

Contribution of Setting

In relation to designated heritage assets, the assessment takes into account the contribution that setting makes to the overall significance of the asset.

The NPPF defines the setting of a heritage asset as *'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.'*

Setting is the way in which the asset is understood and experienced. It is not an asset in itself. It differs from curtilage (historic/present property boundary); context (association with other assets irrespective of distance) and historic character (sum of all historic attributes, including setting, associations, and visual aspects).

Guidance produced by Historic England (HE 2016) has been used to adopt a stepped approach for settings assessment. The former sets out five steps, of which the first four are relevant:

> *Step 1: asset identification. The NPPF requires an approach that is proportionate to the significance of the asset, and for this reason only the settings of the most sensitive (i.e. designated) heritage assets are considered in this assessment. A scoping exercise filters out those assets which would be unaffected, typically where there are no historic links and/or views to/from the site.*
> *Step 2: assess the contribution of setting. This stage assesses how setting contributes to the overall significance of a designated asset.*
> *Step 3: assess change. This considers the effect of the proposals on asset significance. It is noted however that it can be difficult to quantify such change to the overall significance of a designated heritage asset (for example, designation would rarely be downgraded (e.g. from II* to 'II due to changes in setting). For this reason, the impact is reported in this assessment in terms of the extent to which the proposals would change how the asset is understood and experienced (i.e. substantial harm, less than substantial harm or no harm).*
> *Step 4: mitigation. This explores the way to maximise enhancement and avoid or minimise harm. This is typically considered at the design stage (i.e. embedded design mitigation).*
> *Step 5: reporting. Making and documenting decisions and outcomes. This reports the assessment of effects.*

The production of this Heritage Statement has taken into account the physical and sensory surroundings of the asset, in order to understand the contribution 'setting' makes to the heritage significance of the asset(s). This has included topography and intervening development and vegetation. It also considers how the asset is currently experienced and understood through its setting, in particular views to and from the asset and the site, along with key views, and the extent to which setting may have already been compromised.

Definition of Harm

Current guidance by Historic England is that 'change' does not equate to 'harm'. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – substantial and less than substantial. Paragraph 195 of the NPPF states that:

'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...'

Paragraph 196 of the NPPF states that:
'Where a development proposal would 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 proposals...'

3 Site Location and Context

Summary of Site

The location of St Pancras Alms Houses lies within the Western edges of Kentish Town.

Fig. 1 Topographical Survey of Paddington, St.Marylebone and St.Pancras Parishes 1834

Through a review of available maps of the area the progression of development reveals the rural aspect of the site persisting into the 1860's, with sporadic road development shown in the 1868 map (Fig.2) that is fully urbanized by 1880 (Fig.3).

It should be noted that the surrounding buildings, the School and housing that developed around the Alms Houses give no formal regard to them, the traditional 'horseshoe' form if the Houses creating an island of its own courtyard, excluding its context other than to formally address the street through layers of planting and decorative iron railings. This distancing of the site from the public realm is part of its institutional nature but a level change placing the courtyard a third of a storey higher than the street its relative isolation from overlooking has consequences for how the site is viewed, and how the proposed alterations are perceived by passers-by.

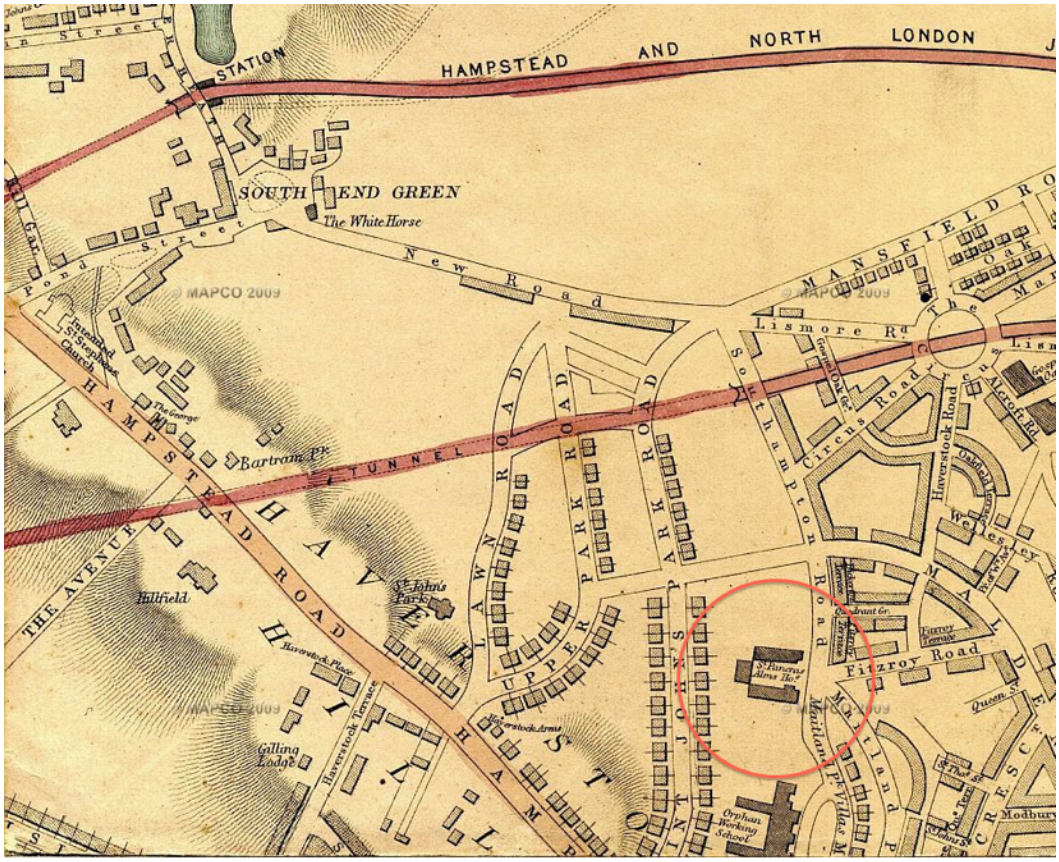


Fig. 2 Map of London 1868 by Edward Weller showing no immediate context buildings

Fig. 3 Ordnance Survey Middlesex XVII 1880

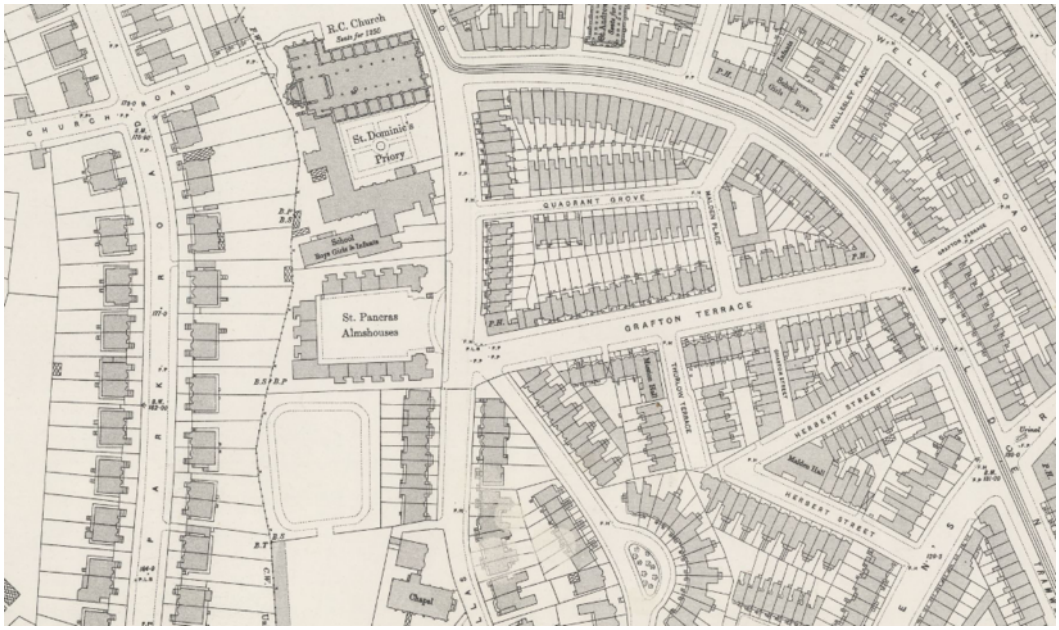


Fig. 4 London VII.1 Published 1895

Asset Description

A brief history of the Alms Houses was written for the Trustees by Thomas Ford and Partners in 2009 and relevant extracts are cited below:

The centenary history sets out the detail of the brief given to the chosen architect:-

> *'The Committee were most precise in their instructions to the architect. The lower rooms of the new building were to be at least eleven feet "in the clear", and the elevation to be 9 feet 6 inches, which with other instructions tend to prove the deep concern of the Committee for the welfare and comfort of the residents. And perhaps beyond all, as showing the Committee's vision: included in their plans was the provision and laying out of the quadrangular lawn, a valuable breathing space that could be used for the quiet sports and pastimes of the residents, for social open air gatherings of the charity's supporters, and in more recent years it so happens for tea parties at which the inmates have so often been the guests of some large-hearted and generous friend. The lawn in front, and the gardens at the rear of the houses - the cultivation of which is left largely to the inmates who find the work a healthful and pleasant pastime - make a beautiful and universally admired setting for the houses and in this, as in so many other directions, show the kindly thought and in view of all that is said today about the value of an open-air life, the great foresight of the benevolent founders'. (Pamphlet, The Story of the St Pancras Almshouses, 1950).*

During the latter part of 1860 and the beginning of 1861 the west range was completed. The north wing was not built until 1863 (seen in Fig.2).

The final stage for the 19th century building campaign was the construction of the Committee Room linking the original south and east wings. Joseph Slater senor churchwarden of St Pancras in 1874 was a member of the Management Committee and supporter of the Almshouses. When he died in 1877 his widow proposed to fund half the cost of a new hall and infirmary, but it was not until 1881 that the hall was finally built. The architects were Dent & Dallas (seen in Fig.4).

It is noted that old committee rooms were converted into a dwelling house but it is not clear where this was located. A further room was added to the rear of House 1 to the designs of the architect H. H. Bridgman. By the early 1950s, not many years after the centenary celebrations it was clear that improvements were needed. A sub-committee was formed and their report was presented in February 1951. The sub-committee had consulted Major Matthews the Honorary Surveyor to the Trustees and a number of recommendations were made for improvements including removal of coppers and sinks at ground floor level at the rear of the houses, demolition of coal-bunkers and provision of bathrooms.

Fig. 5 Ordnance Survey plan London-Middlesex VII.1 1870

No record has been traced for the original layouts of the rear of the houses, but it is likely that there were lean-tos or outbuildings accommodating coal stores, coppers and WCs. The 1950's improvements swept away a number of original features including coppers, ranges and quadrant sinks.*

*It should be noted that the Thomas Ford report appears to have overlooked the OS plan (London-Middlesex VII.1 1870), Fig. 5 where the original rear extensions are well detailed, and show the Alms Houses prior to the construction of the Hall.

The next major work involved was carried out in the early 1970's. A bill of Quantity survives in the Camden archives prepared by Watkinson & Partners for 'Alterations and Extensions'. This involved demolition of the remaining rear out buildings and construction of new flat roofed ground floor extensions. These survive largely unaltered (Camden Local Studies and Archives Centre).

(Thomas Ford Conservation Report, 2009)

Recent Planning history

The alterations discussed in the Thomas Ford and Partners (**2009/1226/L**) were consented and implemented. It was noted in the Conservation Report that some cornice work was retained, however the remaining cornices within the ranges are located not within the accommodation but in the communal stair/hallways, which are not being altered in any way as part of the current proposals.

Application Ref: **2007/1053/P** 29 May 2007

Installation of secondary glazing to timber sash windows and installation of UPVC windows to rear extension, security gates and disabled access ramps to residential dwellings.

Application Ref: **2009/1226/L** 21 August 2009

Internal alterations to remodel the sheltered housing units in association with the reduction in the number of flats from 43 units (32 x studio flats and 11 x 1-bedroom flats) to 39 units (37 x 1-bedroom flats and 2 x 2 bedroom wheelchair accessible flats) and external alterations, including installation of new entrance doors to the ground floor flats 1a and 13a, erection of small ground floor infill extension to block 13 and window alterations to 1st floor above, window/door alterations to guest/laundry room block 8, and installation of an escape deck enclosed by 1.1m high railings on the rear elevation of the single storey extensions of each block.

Application Ref: **2011/4008/P** 28 November 2011

Details of handrails, walkways and fire escape stairs (condition 3) and new doors (condition 4) required by planning permission dated 21/8/2009 (ref. 2009/1336/P).

Fig. 6 Aerial view of the Alms Houses – note perimeter tree screening and recent housing turned away from the rear of the ranges

4 Statement of Significance

This Heritage Statement has been informed by an 20m search area beyond the subject property. The size of the search area has been determined based on the prevailing circumstances within the adjacent area, the nature of the proposed scheme and professional judgment, as suitable for determining the potential impact of the proposed scheme on designated heritage assets. It is therefore consistent with paragraph 194 of the NPPF, in providing a level of detail proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Evidential value

Records indicate that the Almshouse were the first structures built on this agricultural site (Fig.1).

Historical value

"The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances". Critical to the current proposal is the continuity of use that the measures contained in the proposal enable. The recent planning history has involved the enlargement and adaptation of the original dwellings to provide elderly and/or vulnerable residents with contemporary amenities to support their inhabitation. This is partly driven by regulation (extract fans, disability accessible washing facilities etc.), partly by a desire for comfort and sense of security.

The current emphasis on energy efficiency and decarbonising the source of electricity for the Alms Houses seeks to respond to global energy volatility in a way that secures the long-term viability of the institution itself. As such, when utilising minimum interventions using technically compatible materials (low carbon, vapour open) to sustain the original use of the buildings, the historic value of the heritage asset is deemed to be secure.

Aesthetic value

"Aesthetic values tend to be specific to a time - cultural context and appreciation of them is not culturally exclusive." There is a dominant and specific aesthetic driver for the project – the gothic revival. The material choices, stylistic organisation and motifs are particular to the typology of Victorian Alms Houses and has where practical been untouched in the current proposal. There are two aspects to the building ranges – the courtyard and ornamented terminations of the North and South ranges as they meet the street, and the rear of the ranges that are close to the property boundary and which present no aesthetic priority to the neighbouring properties, which in turn present little of themselves to the Alms Houses.

The single manifestation of alteration to the courtyard elevations of the ranges is the proposed addition of a solar array to the roof pitch of the North range. This is the optimal energy generation pitch available to the complex, and the ability to significantly increase energy generation for the site has meant that the most appropriate solution for solar PV deployment has been sought, and is described in detail in Section 5.

The rear of the ranges are of ordinary yellow stock brick to the hall and first floor levels, with the 20th century brick extensions at ground level providing no suitably sympathetic visual additions to the ranges. With the use of PVC-u drainage pipework to these rear elevations there are only the upper storey windows that convey a sense of the history of the building. No alteration to the existing fenestration is proposed.

Communal value

"Communal value, derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory". As the Alms Houses host a community as well as sitting within a wider community there are two audiences that ascribe value. The courtyard is critical to both constituencies, the alterations are therefore confined to the rear of the ranges where limited physical access is needed by residents and no physical or visual access needed by the wider community.

Setting

Following Step 1 of the Historic England settings guidance, the isolation from the majority of the conservation area, and the screened set back from the street of the ranges, with close proximity of the rear of the ranges to adjoining, unlisted and unprotected properties make the evaluation of the setting unusual for a heritage asset within a Conservation area. The intervisibility; the orientation, nature, extent and scale of intervening built form, vegetation and landscape features; the sensitivity of the asset(s), and their corresponding heritage values, to the proposed change to the subject property; and, the nature and scale of the proposed changes within the subject property having no material effect on the values that contribute to the heritage significance of the asset(s) identified.

Summary

In making this assessment, consideration has been given to the intrinsic architectural merit of the subject property, its completeness, the extent of any alterations and their effect on its 'significance'. The contribution made by setting to an understanding and appreciation of this building's significance and the degree to which the building illustrates aspects of local or national history has also been considered.

The significance of the subject property is principally derived from the aesthetic and historic value of its principal elevation, its age, notably the survival of the 19th century courtyard façade and its remaining plan form and structure.

5 Impact Assessment

This section assesses the likely impact on the significance of heritage assets. The focus of alterations to a listed building is properly focused on restricting changes to areas of unoriginal fabric. With wider retrofit requirements that respond to the impacts of the energy crisis, a considered and effective installation does not discriminate between original and unoriginal fabric. The priority is therefore to deploy effective heating, insulation, energy generation and ventilation strategies in a way that minimizes physical intervention and delivers technical performance that works with vapour-open load-bearing masonry structures.

The impact assessment focuses on distinct work packages to describe the mitigation measures taken and the steps taken to minimize impact on the listed building, in particular where original fabric is affected – these work packages comprise work to convert the Laundry as an extension to the existing guest accommodation; works to the communal Hall; retrofit measures to the dwellings; installation of a community photovoltaic (PV) array.

Impact of proposals: Laundry

Alterations to the existing Laundry involve the incorporation of the existing but unoriginal facility into an extended guest accommodation (which currently comprises a bedroom and shower room), which is available to all residents of St pancreas Alms Houses. The new proposal extends to the rear to provide a separate bedroom, allowing for families to stay, or for guests to stay longer with appropriate facilities. The laundry provision is relocated to existing communal spaces adjacent to the Hall.

The conversion of a former small flat into the guest accommodation and laundry removed the internal original walls and plasterwork, the original brick arch over the window visibly re-used for the laundry door, which is unsympathetic to the original building.

The proposal also obviates the necessity for the recent security railings (shown in Fig.7).

The new extension is built to building regulations and follows the pattern of rear extensions set by the rest of the range in terms of height, extent, material and roof finish. The existing doorway is retained as a storage alcove, with a new doorway required to create suitable internal shower provision.

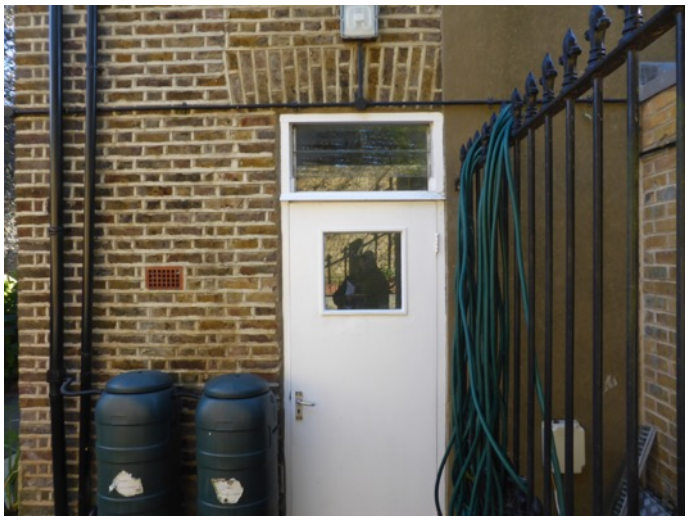


Fig. 7 Doorway on the rear elevation leading to a narrow laundry space

Externally a modern concrete slab is removed for the extension, with no loss of original construction. The insulated render is described in the dwelling work-package.

Impact of proposals: Hall

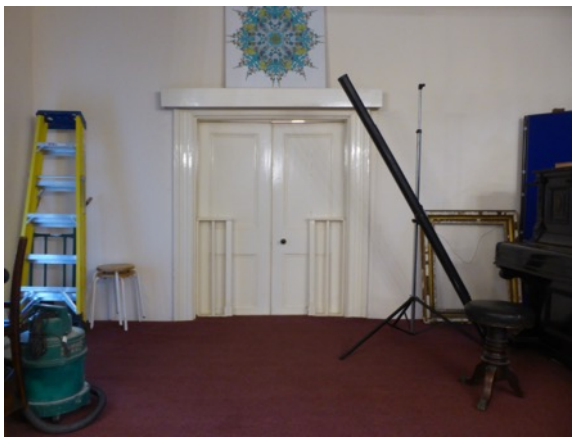
Alterations to the public Hall are required to reverse the minimal use of the space, a situation caused by the inability to heat the space adequately or occupy the space properly due to the presence of an unused and unoriginal stage, the lack of ready access to kitchen facilities (via leaving the Hall and re-entering the adjoining 'Library' with kitchen), and poor decorative treatment.

The proposal seeks to restore the volume of the original Hall by removing the ad-hoc timber stage and plywood proscenium arch (Fig.8) and the adjoining glazed lobby structure (Fig.9). The significant cornice (Fig.12) is currently divided by the timber proscenium and lobby, and the removal of these elements restore the continuity of the space and decoration.

Figs. 8,9 later additions of the plywood proscenium arch and glazed lobby

To the rear of the stage a pair of double doors original to the Hall (Fig.10) have been reduced at the bottom of the doors to install a short flight of steps up to stage level. The architrave has been retained so the original doors will have the section at the base of the doors reinstated. The pelmet fitted over the door for stage blackout to be removed. Fig 11 shows steps adjacent to the external Hall door leading up to the stage, which will be removed. The removal of the lobby allows the external door shown in Fig.11 to be used as a Summer/warm weather entrance but to use the restored double doors in Fig.10 as a Winter/cold weather entrance allowing the existing adjacent 'Library' to act as an entry lobby retaining heat in the Hall.

The adjoining 'Library' work-package is addressed below.



Figs. 10,11 doors to the current Library, unsafe stage steps next to courtyard entrance door

Four contemporary brass chandeliers provide lighting to the original lime and lath ceiling, which has two unused original ceiling roses. The proposal relocates one of these chandeliers to the adjacent room and moves two to utilize the ceiling roses.

Figs. 12,13 Hall cornice, Hall courtyard entrance door

The courtyard entry door is located within a wall that faces the courtyard (Fig.13). Insulation to the exterior if the façade in this location would be unacceptable due to the impact on the primary presentation of the building. To secure appropriate comfort levels for its elderly or vulnerable community of residents the insulation of the Hall is essential. The section of external wall that the entry door sits within therefore requires internal insulation. To ensure minimal impact to the interior the internal plaster is proposed to be removed from floor level to the lower edge of the cornice is removed back to brick and replaced by aerogel insulation with a lime plaster finish that is capable of delivering significant thermal improvement whilst retaining the original level of interior surface and its relationship to the cornice and the retained plaster which becomes an internal wall due to the presence of the adjacent ‘Library’.

Underfloor heating works to effectively warm high ceilinged spaces using lower temperature inputs. The radiant heat from the floor provides warmth up to around 2 metres above the floor level, which is the human occupation zone, and via efficient air sourced heat reduces energy demand whilst ensuring constant thermal comfort. The existing Hall floor is linoleum on a leveling screed circa 1950’s (Fig.14) that has replaced the original fireplace hearthstones, with no discernible evidence of under-slab insulation. Removal of this linoleum and screed layer allows for an insulated underfloor panel system to be installed with an engineered timber finish that is not expected to increase the existing floor level significantly.

The impact of the underfloor heating proposal is not considered significant as neither floor finish, substrate, nor skirting boards are either original or sympathetic to the original design. No records of the original floor remain, however parquet is likely to have been used on a solid floor. If the original slab remains intact under the linolueum and leveling screed then it will be restored in-situ. A hearthstone can be reinstated in the original fireplaces as a result of removing the linoleum and screed (Fig.15), which will enhance the status of the marble fireplaces.

Secondary glazing which is fully reversible will be fitted to the existing sash windows, as has been done to the Alms House dwelling windows facing the courtyard.

Fig. 14 Original fire surround with screed/linoleum replacing the missing hearthstone

Within the adjacent 'Library' the current provision of books will be relocated on freestanding shelving to the Hall which will provide a warm social and study space for residents. The former 'Library (Fig.15) will have a new partition wall creating the lobby area for the Hall and house within cupboards (detailed as per the existing double doors to the Hall) the washing machines and access to a Doc M fully accessible toilet for use by residents in the Hall. Fig 16 shows the existing WC to be replaced with the fully accessible facility, it appears circa 1950 with lead waste pipework and has little discernible heritage value.

Figs. 15,16 The existing Library adjacent to the Hall.

The proposal to enlarge the existing kitchen (Fig. 17) involves the insertion of a door giving direct access from the Hall and the removal of the recent formica kitchen units. This proposal would facilitate Hall functions as well as everyday use by giving ready access to light duty kitchen facilities, considered by the residents essential to support their activity within the Hall. Inserting a doorway is significant as it affects the East elevation of the Hall and impacts on the fabric of the wall itself. The use value given by the location of an adjoining kitchen is paramount to enabling the original social function of the Hall to remain viable, with the positioning of kitchen functions within the Hall itself explored as options for the consultation events. The option to do this was rejected as the housing of supply and waste pipework through the Hall floor would be physically disruptive to the fabric of the building, and result in the division of the space – precisely what the current stage does to the detriment of the original Hall.

Fig 18 shows that the narrow space currently occupied by the kitchen has an original cornice, albeit damaged by water penetration. To preserve the cornice and proportion of the room whilst facilitating a viable kitchen space it is proposed to retain the wall and ceiling at high level by inserting a beam which opens up below the beam for a widened kitchen and disabled access WC

Figs. 17,18 Existing kitchen (West/Hall wall) and existing kitchen cornice.

The doorway to the Hall needs to enhance the East elevation of the Hall, which has the gothic pointed doors to the courtyard and the paneled classical doors to the former Library in the centre of the wall. The rational response is to replicate the pointed gothic entrance doors to access the kitchen, providing symmetry and maintaining the tension between the gothic style, required by the later Hall to respond to its courtyard context, and the classical internal doors which echo the rest of the Hall – indicative of the stylistic shift from neo-gothic of the 1860's back to classically derived forms of expression in the mid-1880's. The new kitchen door is an exact facsimile of the entrance door, a double leaf door that is convenient for individual access but able to open fully in an event situation or to maintain the appliances etc.

A ventilation/heat recovery unit will be located in the attic above the ceiling level to service the Hall, kitchen, lobby and WC. Ventilation pipework can run within the attic and will require the provision of discrete grilles that will be painted as per the ceilings.

To support energy efficiency the currently un-insulated volume of the Hall requires attention to retain heat and maintain comfort levels for elderly residents within a pressurized energy economy. Internally a small section of aerogel is necessary around the external wall to the courtyard (Fig. 13) to replace original wall plaster, however this is treated as an exceptional situation as the retention of original interior fabric within this high status space is a priority. As such, and in recognition of the undecorated, workmanlike exterior of the Hall which has only minor visibility, and external wall insulation option has been chosen. The use of a woodfibre insulation system provides fully vapour-open construction that maintains the technical performance of the low-firing temperature stock bricks bedded in lime mortar. A lime finish coat with vapour-open silicate paint in a colour closely matched to the ochre-yellow stick brick is specified.

Figs. 19, 20 and 21 illustrate the unadorned exterior of the Hall, the unoriginal PVC-u guttering able to be relocated using a lead flashing to the exterior of the approx. 100mm insulation layer. A short section of original cast iron guttering remains on the South elevation and will be retained in the revised position.

Figs. 19,20 South and North elevations showing plain stock brick and PVC-u drainage

The brickwork has been previously re-pointed in weather-struck Portland cement mortar (Fig 21), which may need to be removed to restore full vapour permeability. Wood fibre insulation will be installed as per the manufacturers direction. Bespoke lead flashing details retain the existing creasing tile gable copings.

Fig. 21 West gable elevation to the Hall

The external ground level has over time been raised, with layers of impervious tarmac causing the surrounding surfaces to drain rainwater towards rather than away from the Hall. Fig 22 shows considerable water penetration into the walls of the Hall. Intrinsic to the insulation of the Hall is the lowering of the tarmac external surface with the installation of a linear drain against the low retaining wall seen to the right of Fig 23. The renewal of the external surface allows for the current poorly organized waste and rainwater pipework to be reinstalled in an orderly way connecting into the existing inspection chamber, the lid of which will be lowered accordingly.

Figs. 22,23 Water damage to the Hall walls, raised external ground level

Proposals for a solar PV array on the Hall will be discussed in the later section on energy generation.

Impact of proposals: Dwellings

It is acknowledged that the courtyard elevations are the most significant aspect of aesthetic value that the buildings deliver. Any energy installation that has to deal with the presentation of the buildings within the courtyard would require justification, and should therefore be avoided where possible. The preservation of the courtyard elevations (Fig.24) requires the consideration of internal wall insulation to optimise energy efficiency whilst protecting the heritage asset. Internal wall insulation requires consideration of the impact on the interior materials and details. It is instructive to review the 2009 Conservation Report to consider the retained original internal details:

Interiors: The interiors of the houses have been much altered over the years. Major works were carried out in the 1950s and 1970s which involved removal of some of the internal features such as fire places, ranges and rear additions. The listing notes that the interiors were not inspected and it is problematic to make a full inspection of the tenanted houses. However, a limited inspection of vacant and accessible areas indicates that few original features remain.

The principal elements that survive are:-

The staircases.
Windows.
Isolated individual original internal doors.
Ironmongery either fitted to original doors or modern replacements. Isolated sections of plain cornice to ceilings.
Small timber storage cupboards.

(Thomas Ford Conservation Report, 2009)

Fig. 24 overall view towards the West range

The staircases/hallways outside the scope of proposals so remain unaltered. The windows already have secondary internal glazing' which is reversible, so do not require intervention.

No internal doors that serve habitable spaces remain from the original scheme (Figs.25,26), with the requirement for FD30 fire door provision having removed and replaced them many years previously. Some alterations to these doors will be requires during the installation of underfloor heating (referred to later), but the modern construction of these doors mean that this is not significant.

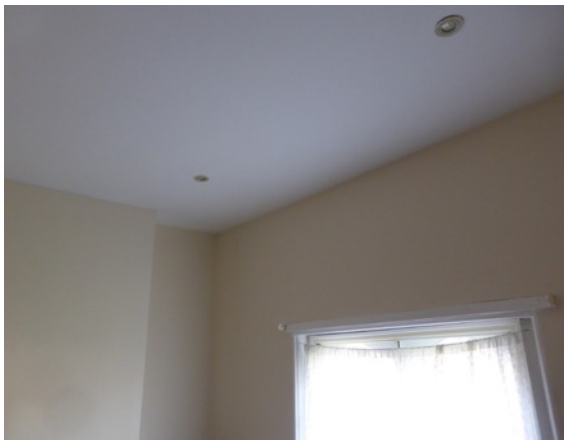
Figs. 25,26 Internal view showing new skirting and floor coverings with new FD 30 fire door

No original ironmongery is in use on FD30 fire doors as they would compromise fire certification. The 2009 report refers to cabinet or cupboard ironmongery that is not affected by this proposal.

The isolated sections of cornice referred to are within the stairways, the lath and plaster ceilings to the dwellings having been removed and replaced by plasterboard at some earlier date (Fig.27)

Fig. 27 Original cornice to the stairway unaffected by the proposals

As seen in Fig 28, the dwellings are devoid of cornices, some flats have new cornices fitted where new partitioning has been installed but as these stud walls are not part of the original floor plans, their age has to be commensurate with the modern alterations. They do not match those within the stairways.



Figs. 28,29 existing plasterboard ceilings within the dwellings, the retained 'small timber cupboard

In Fig. 29 the 'small timber cupboards' referred to in the report sit within the alcove of the main room between chimneypiece and the external wall of the flats. The chamfer detail to the framing of the single panel door links to details on the entry doors, giving these simple but characteristic elements value, particularly as so little original fabric remains within the dwellings. As such the installation of internal wall insulation would require that such cupboards are retained in their current location and remain operational.

A fielded timber panel is seen below the courtyard windows in each dwelling (Fig.30). This is not listed in the Thomas Ford and Partners 2009 inventory, but any application of internal wall insulation will require the retention of this detail - the panel carefully removed, the wall to the rear of the panel insulated with a thinner sheet of wood fibre IWI and expertly refitted. Note in Fig. 30 the internal secondary glazing used on all courtyard windows, to be retained. With the installation of underfloor heating systems to all dwellings the existing electric storage heaters also seen in Fig.30 can be removed, presenting the window and timber panel as originally envisaged by the architect of the Alms Houses.

Fig. 30 existing timber panel below the courtyard windows

Underfloor heating is intrinsic to converting the Alms Houses to a low carbon development. With air source heat pumps (ASHP's) converting 1x electricity input into 3x heat output, the return on heat for £ per Kw is significant, but only if insulation retains the lower temperature operational levels that ASHP's generate. Underfloor heating works at 40 degrees, whereas conventional radiators operate at 70 degrees. As with the Hall, the use of minimal depth retrofitted underfloor heating systems allow for the retention of the original floorboards on the first floor dwellings, and the ability to retain the existing floor slabs on the ground floor with minimal intervention. Retaining the ground floor dwelling slabs is not due to intrinsic heritage value of the slabs per-se, but also minimizes noise and vibration impacts created by removing the slabs felt by the building fabric and the operatives having to undertake demolition work (therefore minimizing a risk to health), protects the residents on site from extreme disturbance, mitigates the waste of embodied carbon captured in the Victorian mass-concrete and the financial cost of removal for the Trustees. The extent of the internal application of a wood fibre and lime plaster system is restricted to external walls only with the return walls that are masonry insulated to minimize cold bridging and the risk of mould growth.

To the rear of the ranges on ground floor the new rear extensions present poor quality brick cavity wall construction (Fig.31) using exposed concrete lintels to windows and rear door heads (Figs. 32,33). To

minimize internal disruption and expedite the works to each flat as swiftly as possible (minimizing in turn the absence from the flat of its elderly resident), and importantly to deal with the cold bridging issues it is proposed to use external wood fibre wall insulation with lime render, retaining the relatively new PVC-u double glazed windows and doors. The PVC-u guttering will be remounted onto matching painted softwood gutter boards with the zinc roofing surface extended to bridge across the additional 100mm wall build up.

Fig. 31 North range rear extensions, also present on West and South ranges

The minimal space between the opening window/door elements and the minimal brick reveals (Figs.32,33) will use aerogel to minimize cold bridging around the frames, with the creasing tile cills replaced with timber and capped with a flashing.

Figs. 32,33 rear extension – cold bridging lintel and cill details

The first floor rear elevations are mostly original exposed brick with a tall band of Portland cement render to cill level (Fig.34) installed when the new rear extensions were built. Rainwater and waste-water service pipework are located at almost regular intervals, with ventilation grilles and surface cabling present. The original brickwork has been re-pointed using weatherstruck Portland cement based mortar.

Internally bathrooms occupy the rear of the first floor flats, as with the decision to externally insulate the ground floor, the same issues of resident empathy and avoiding the erasure of their home apply in this location. AS such and after consultation with the Planning Authorities, it has been decided to use internal wall insulation to the rear first floor elevations as per the courtyard elevations, which will remain 'as existing' (Fig.34).

Fig. 34 First floor rear elevation (South Range – common to North and West)

Alongside insulation and low energy heating provision, responsible retrofit requires that ventilation is addressed comprehensively. The location of the relatively large mechanical ventilation and heat recovery units (MVHR) is challenging for historic buildings. Within the ground floor flats the relatively high ceiling levels allows for the small hallway/transition spaces between the living spaces and rear bedrooms to receive a suspended plasterboard ceiling above which the MVHR is fitted with relatively direct duct connections to the range of rooms to remove stale, warm air from and deliver fresh warmed supply air as a low but constant rate.

The location is carefully chosen in each dwelling type to minimize duct pathways and requisite opening up – the internal partition wall alterations for the proposed wall mounted grilles and airways and previous loss of original ceilings mean that the impact on the original structure is minimal, with the existing, plasterboard ceilings and original joists above remaining untouched. The dwellings to the Eastern end of the North and South ranges have elaborate plans and are much altered internally. The location of the MVHR units are harder to locate with minimal duct run lengths, however the main rooms are avoided so do not alter the proportion of these spaces. The impact on these already altered interiors is therefore minimal.

The intake and extract grilles will be located just above the rear extension roof surface (Figs.35,36) approximately at the height where existing vent grilles are already located. The grilles would be set into the lime rendered external wall insulation to minimize the visual presence of the grilles from ground level, locations are indicated on the SPA rear elevations.


Figs. 35,36 Locations for external intake and exhaust grilles on the South and West ranges

On the first floor the spacious but unused attic area above the ceiling levels allow the MVHR units to be situated without requiring the installation of a lowered ceiling. Ceiling grilles are required, but fitting within plasterboard ceilings does not affect fabric with significance. To minimize the presence of the grilles they will have a fine mesh and be decorated as the ceiling. The external ventilation will be via bespoke lead-hooded grilles that will replace a single slate per grille on the rear pitch of the roof near to the gutter level.

The location of the ASHP units requires specific distances from adjacent walls and proximity to drainage. They have been located to the rear of the ranges to avoid impacting the important courtyard elevations, set away from views out of windows, with the ability to deliver mechanically controlled background ventilation meaning that adjacent windows do not need to be opened, so the operational sound of the ASHP operation (comparable to a refrigerator) will not impact the interior. The service access that is afforded at the rear of the ranges allows for maintenance without impacting the lives of the residents, as resident use of this rear external space behind the rear extensions is minimal.

The final element of a comprehensive energy strategy is energy generation. The extensive rooves on the Alms House ranges allows for a consideration of solar photovoltaic arrays. The existing rooves were considered in the 209 Conservation Report:

Roofs: It appears from the engraving of the new buildings that the slated roofs were originally arranged in a diaper pattern of contrasting coloured slate. The current slating is plain blue/grey welsh slate which is likely to be a post 1940 20th century replacement. The black clay ridges with fleur-de-lys inserts may well be an original feature as both the early engravings (Figs. 2 & 4) show a decorative ridge. The chimney stacks serving each 'house' are an original feature, however, the buff coloured clay pots are unlikely to be original and may have been renewed at the same time as the roof. Some of the rear stacks have been taken down.
(Thomas Ford Conservation Report, 2009)

As shown in Fig.37, there remains evidence of diapered slates to the East-facing pitch of the West range, contrary to the 2009 report. Four of the six main roof pitches have a suitable orientation for a photovoltaic (PV) array, however the prominence of the East facing pitch which faces the courtyard and the street, reinforced by the presence of the original diaper pattern indicate that PV's would be inappropriate for this location, and that the priority for on-site energy generation needs to be aligned to heritage significance.

Fig. 37 Roofscape of the Almshouse with the East-facing pitch on the West range at the top of the image

The optimum location for PV's is the South pitch of a roof. On the South range and Hall the Southern pitch is away from the courtyard, making the impact of a PV array less significant in heritage terms but has some overshadowing from the adjacent social housing block that lowers its efficiency. The West-facing pitch of the West range again faces away from the courtyard but is again subject to overshadowing. The only pitch with uninterrupted solar exposure is the courtyard facing pitch of the North range. It is acknowledged that the courtyard roof pitches facing the courtyard are sensitive, however through careful arrangement between the original chimney stacks and placement at a suitable distance from the eaves and decorative ridges – combined with the selection of panels that are framed in minimal black edges closely aligned.

Despite extensive slate replacement having taken place, the roof pitches have consistent materiality that requires an approach to PV installation that minimizes any intervention in the roof surface or timber rafters. Minimal intervention in the original fabric is achievable, and the arrays are removable/reversible with the use of mounting brackets that require only the notching of isolated slates.

Implications

The scope of physical interventions in the Laundry/guest accommodation, Hall/Library, external ground levels, the flats and the rooves of the Alms Houses for energy generation have been developed in a way that delivers critical energy efficiency whilst ensuring that the technology is deployed in deference to the aesthetic and historic value of the listed building complex. Details of the proposed technology is described within the accompanying Design and Access Statement.

6 Assessment of Impact in a Legislative Context

The following section will present the relevant legislative and policy framework against which the proposed scheme will be assessed.

Statutory protection

In determining any planning application for development, the local planning authority will be guided by current legislation, government planning policy, and the policy and guidance set by the relevant Local Planning Authority (LPA).

The following section sets out the legislative and planning policy context for the proposed scheme, including national and local planning guidance.

The applicable legislative framework to this assessment includes the following: The Town and Country Planning Act 1990;
The Planning and Compulsory Purchase Act 2004;
The Planning (Listed Buildings and Conservation Areas) Act 1990, and
The Planning Act 2008.

Conservation Area and Listing

The Planning (Listed Buildings and Conservation Areas) Act 1990 (P(LBCA) Act) sets out the legal requirements for the control of development and alterations which affect listed buildings and conservation areas.

Any decisions relating to Listed Buildings and their settings and conservation areas must address the statutory considerations of the P(LBCA) Act 1990. The key elements of this Act relevant to this heritage statement are outlined below:

Section 66 places a responsibility upon the decision maker in determining applications for planning permission for a Scheme that affects a listed building or its setting to 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; and Section 72 of the Act places a duty upon the decision maker in determining applications for planning permission within conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

As far as Section 72 is concerned, it has been established by the Courts that development that does not detract from the character or appearance of a conservation area is deemed to be in accordance with the legislation. In other words, there is no statutory requirement to actively 'enhance'.

Section 1 of the 1990 Act also imposes a duty on the Secretary of State to compile or approve a list or lists of buildings of special architectural or historic interest as a guide to the planning authorities when carrying out their planning functions. Alongside the 1990 Act the government has also produced guidance on the Principles of Selection for Listing Buildings (DCMS 2010). The statutory criteria for listing are the special architectural or historic interest of a building. Many buildings are interesting architecturally or historically, but in order to be listed, a building must have "special" interest.

Buildings on the list are graded to reflect their relative architectural and historic interest, based on the below:
Grade I buildings are of exceptional interest;
Grade II* buildings are particularly important buildings of more than special interest;

Grade II buildings are of special interest, warranting every effort to preserve them.
In addition to the statutory criteria for listing – architectural and historic interest, and group value, the following general principles are also considered by the Secretary of State when determining if a building is suitable for addition to the list of building of special architectural and historic interest.

National Planning Policy Framework

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The framework recognises the need for the planning system is to contribute to the achievement of 'sustainable development', through achieving three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 11 of the framework states that *'plans and decisions should apply a presumption in favour of sustainable development'.*

Section 16, paragraphs 189 to 208, of the framework sets out the national planning policy basis for conserving and enhancing the historic environment.

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Paragraph 11 of the framework states that *'plans and decisions should apply a presumption in favour of sustainable development'.*

Section 16, paragraphs 189 to 208, of the framework sets out the national planning policy basis for conserving and enhancing the historic environment.

Paragraph 189 recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not.

Paragraph 194 places a duty on local planning authorities to require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should

be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraphs 199 to 208 of the framework address the impact of a proposed development on the significance of designated and non-designated heritage assets.

Paragraph 199 of the framework states that, *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

Paragraph 200 of the framework states that, *'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'*

Paragraph 201 of the framework states that, *'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.'*

Paragraph 202 of the framework states that, 'Where *a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

Paragraph 203 of the framework states that, 'The *effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'*

Paragraph 204 of the framework states that, 'Local *planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.*

Paragraph 206 of the framework states that, 'Local *planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*

Paragraph 206 of the framework states that, 'Not *all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'*

The web-based National Planning Policy Guidance (http://planningguidance.communities.gov.uk/) provides supporting information in respect of planning at the historic environment but no additional policy for archaeology to that set out in the NPPF.

Local Policy

Following the Planning and Compulsory Purchase Act 2004, local Planning Authorities were required to replace county level structure plans and district level local plans, and unitary development plans (UDPs), with a new system of Local Development Frameworks (LDFs). These are a portfolio of local development documents, now more commonly referred to as the 'Local Plan' or 'Local Development Plan'. In some cases, UDP policies maybe either 'saved' or 'deleted'.

The following plans relevant to this application are:
The London Plan 2021
The Camden Local Plan 2017

In addition, the Camden Planning Guidance document on Design is also relevant to this document.

Only the relevant policies and parts thereof are highlighted below:

The London Plan 2021
Policy HC1 Heritage conservation and growth
This policy states that "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 avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process."

Policy HC3 – Strategic and Local Views
This policy outlines how development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Strategic views include riverscapes that help to define London at a strategic level.

The Camden Local Plan 2018
The following objectives and policies are considered to be of particular relevance to this Heritage Statement:

Policy D1 Design
The Council will seek to secure high quality design in development. The Council will require that development respects local context and character; and preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage

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. 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. 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:
Require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

Listed Buildings
Listed buildings are designated heritage assets. To preserve or enhance the borough's listed buildings, the Council will:

resist the total or substantial demolition of a listed building;
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
resist development that would cause harm to significance of a listed building through an effect on its setting.

Camden Planning Guidance: Design (2021)
This document provides guidance relating development affecting heritage assets in accordance with the Local Plan and the NPPF. The Key messages are:

Camden has a rich architectural heritage and we have a responsibility to preserve, and where possible, enhance these areas and buildings.

The Council will only permit development within conservation areas that preserves and where possible enhances the character and appearance of the area.

Historic buildings can and should address sustainability and accessibility.

Heritage assets play an important role in the health and wellbeing of communities.

Planning Summary

This Heritage Statement has undertaken a proportionate assessment of the significance of the grade II listed Alms Houses, the contribution made to it by the setting and the impact of the proposed scheme on its significance within the Parkhill Conservation Area. It has been undertaken based on a full assessment of legislation and policies context pertinent to the proposed scheme.

It has determined that the heritage values that contribute to the significance of the St Pancras Alms Houses are principally derived from their age, intact facades to the courtyard, the attributes embedded in their overall physical form and their illustrative historical interest. The setting outside of the open courtyard and green street frontage makes a minor contribution to the understanding and appreciation of the buildings' significance, with the setting to the front of the property more historically significant than the setting to the rear which has been undermined by alterations to the ranges and the consequent loss of original ground floor facades, details and planform.

The proposed works will have a minor direct impact on both historic fabric and non-historic fabric. Where historic fabric is affected, the fabric is considered to make a minor/limited contribution to the understanding and appreciation of the significance of the heritage asset. Any perceived or negligible harm will be offset by the public / heritage benefits afforded by the scheme.

Paragraph 199 of the National Planning Policy Framework 2021 (the Framework) advises that when considering the impact of development on the significance of designated heritage assets, great weight should be given to their conservation. Paragraph 200 goes on to advise that significance can be harmed or lost through the alteration or destruction of those assets or from development within their setting and that this should have a clear and convincing justification. The proposal would only affect one roof plane of the building and the effect on the conservation area would be restricted to the near vicinity of the appeal site. As a result, the effects of the proposal would be limited in extent and would not lead to a total or extensive loss of significance to either the listed building or the conservation area. In the light of the above, I find the harm to be less than substantial in this instance but, nevertheless, of considerable importance and weight.

Although the generation of electricity to meet the site's own needs is not of itself a public benefit, the proposal would reduce or remove the reliance of the Alms Houses on electricity generated by methods that produce carbon dioxide (CO^2) and would potentially generate a surplus of electricity from a renewable source that could be exported to the national grid.

A balance needs to be struck between the benefits of renewable energy generation and associated insulation works to mitigate heat losses/conserve energy for heating and preventing harm to the significance of historic buildings and areas.

The subject property is located within the Parkhill Conservation Area. As a conservation area the LPA have a duty to preserve or enhance its character and appearance. The proposed alterations will not change the existing plan form of the development within the conservation area significantly, nor will it impact on any core attribute that contributes to an understanding and appreciation of the character and appearance of the conservation area.

Relevant to the alterations proposed to the courtyard roof and the installation of a solar PV array is Appeal Decision **APP/X5210/W/20/3259869** related to the provision of solar PV panels to the roof of St Mary's Church, listed Grade II and located within the Primrose Hill Conservation Area (Elsworthy Road NW3 3DJ). In the decision dated 22nd December 2021, **John Dowsett MA DipURP DipUD MRTPI** found in favour of the applicant, who had reduced a full South roof coverage of Solar PV panels (87 no.) to a smaller array of 58 which allowed the slate roof perimeter to remain visible, placing the panels within the roof in a proportion that respected the overall shape of the roof pitch.

Critically, the Inspector noted the following:

> 31. Given the above, I conclude that although the proposed works set out in the appellant's Option 2 would not preserve the special architectural interest of the Grade II listed building nor the character and appearance of the Elsworthy Conservation Area, this harm to the heritage assets is justified by the public benefits that would arise from the proposal. This would satisfy the requirements of the Act and paragraphs 197 and 200 of the Framework. It would also meet the relevant requirements of Policies D2 and CC1 of the Camden Local Plan 2017 which seek to respectively preserve, or enhance, designated heritage assets and to minimise the effects of climate change. As a result, the proposal would be in accordance with the development plan.

This decision is important in that it establishes that public benefit is accrued through the deployment of renewable solar energy generation even on listed buildings within Conservation areas, where the array is considered subservient to the proportion and rhythm of the host building roof, and detailed to retain historic fabric.

7 Conclusions

The Almshouses have been altered and improved over the years but their essential character has been maintained. The three solidly constructed terraces with their end pavilions frame an attractive garden that has a sense of an ecclesiastical cloister. Much of the interior detail in the houses which was of a modest nature, regrettably much of which has been lost through various campaigns of improvement and regular routine maintenance. The Design and Access Statement sets out how maximum retention of historic fabric underpins the proposals, and where alterations around energy generation and insulation application are proposed, that the work is sympathetic to the technical performance of traditional brick construction (vapour open) and reversible, removing little or no original fabric in the process of retrofit.

In conclusion, it is considered that the proposals produce a coherent and informed response to context without undermining any of the heritage values that contribute to the significance of the subject property or the setting, character or appearance of the conservation area. Where historic fabric is to be lost this is limited to fabric that does not contribute to an understanding and appreciation of the assets significance and any perceived harm will be offset by the public and heritage benefits that are proposed as part of this scheme. The scheme is, therefore, believed to both conform with paragraph 202 of the NPPF and be in accordance with all other relevant national and local planning policy.

Appendix 1

Summary table of actions

Item	Proposals	Justification	Significance	Benefit/mitigation	Assessment
Remove existing Laundry, extend guest dwelling to rear	New opening to original rear wall, reconfigure internal/modern partitioning, new extension to match existing.	Social benefit to residents, alterations to original fabric minor with changes generally to modern fabric, significant sustainability retrofit for long-term viability of the original user organization.	**Mid** The existing fabric is compromised and does not contribute to the defining character of the building. The extension is a substantial alteration to the West range, however is in line with existing/ consented rear extensions in scale, materiality and use.	**Benefit** Enhances guest accommodation to include families of residents who cannot currently be hosted in the existing 'bedsit' arrangement **Mitigation** Following existing format using sympathetic vapour open construction.	**Positive** Removal of sub-standard poorly heated communal laundry facility created within last 20 years, enhanced guest accommodation without impacting significant public/courtyard elevations.
Internal alterations to Hall and Library	Removal of unoriginal stage, restoration of connecting doors, new doorway to kitchen with timber floor/underfloor heating, secondary glazing with minor lighting relocation.	Reinstate original Hall volume, create warm and efficient social space currently redundant due to ineffective/unafford able heating and poor layout. Ready access provide to kitchen facilities to support communal uses. Revitalise former Library space with essential disabled access WC facility.	**High** Most significant space in the Alms Houses, therefore original fabric losses are strictly limited to a single doorway opening and internal plaster around the existing courtyard doorway.	**Benefit** Hall restoration is linked to an energy efficient internal comfort strategy and the ready access to practical support facilities for elderly and vulnerable residents. Retention of original ceiling to current kitchen space ensures original planform and details are retained in-situ. **Mitigation** Sympathetic design and material specification.	**Positive** Respecting the original detailed design of the Kitchen doors and storage/Laundry cupboards and providing essential facilities within the valuable existing aesthetic creates meaningful improvements to residents lives and sustains the viability of the original organization.
Addition of external wall insulation (EWI) to Hall	Use of vapour open EWI to Hall elevations finished with lime render and silicate paint. Minor modifications to existing modern service pipework and roof finishes	Integral part of a sustainable, building compatible low energy retrofit in response to the energy and climate crisis.	**Mid** Minimal impact to significant courtyard elevations, however significant change to rear elevations of the Hall, which is not visible form the public highway or surrounding buildings.	**Mitigation** Careful detailing to avoid alterations to existing/original fenestration, preservation of existing cills whilst eliminating cold-bridging.	**Positive** Positive and sympathetic treatment to rear elevations, removal of harmful cement based render and pointing.
Installation of ASHP and MVHR systems combined with an underfloor heating system	Replacing high running-cost convector heating in un-insulated flats with low temp/low input system with heat recovery ventilation.	Sustainability and stabilization of the Alms Houses energy cost commitments via a comprehensive low carbon/low cost energy strategy.	**Mid** Physical interventions throughout the site, restricted to modern fabric alterations wherever practical, ASHP and MVHR siting avoiding sensitive locations.	**Benefit** Significant energy viability for the organisation **Mitigation** Considered installation minimizing interventions in historic fabric.	**Neutral** Alterations to the buildings offset by organization of the fit-out and ability to sustain the original owner/occupier/ use.

Item	Proposals	Justification	Significance	Benefit/mitigation	Assessment
Alterations to existing external ground levels around the Hall	Intervention in existing tarmac-base external ground surfaces to mitigate water exposure to vulnerable solid masonry walls and direct surface water away from the walls to new linear drainage.	Significant damp issues to walls creating damage to internal wall finishes and exacerbating heat loss through the walls via saturation.	**High** The existing fabric is compromised by successive layers of tarmac laid to fall towards the building. The tarmac itself has no heritage value and protecting the building form water infiltration is a priority. Reinstatement of external tarmac as per elsewhere on site.	**Benefit** Dry masonry, ability to deal holistically with issues of heatloss and internal comfort for elderly residents. **Mitigation** NA.	**Positive** Conserving the historic building fabric.
Solar PV arrays to four roof pitches orientated South and West	Installation of black framed PV arrays linked directly to the Alms Houses electrical system to significantly contribute to the standing load of the dwellings.	Electricity charges have increased for £10K per annum to £50K per annum, threatening the viability of the organization and its role as a sheltered housing provider.	**High** Most of the arrays are able to be located on the rear roof pitches that do not contribute to the significant presentation of the building character. The South pitch of the North rang facing the courtyard does face the courtyard.	**Benefit** This location affords high levels of solar harvest that on balance supports the viability of the investment in renewable energy**.** **Mitigation** Sympathetic design and setting out in relation to the layout and rhythm of the elevations/chimneys, careful selection of mounting system to retain roof fabric and all-black visually reticent panel specification.	**Negative** Acknowledging the installation of PV's on the South pitch of the North courtyard range is not a p[ositive contribution to the presentation of the listed building, however it is reversible, discrete and essential for the economic viability of the original Alms House organization.

Appendix 2

Statutory Address:
ST PANCRAS ALMSHOUSES NUMBERS 1-13, SOUTHAMPTON ROAD
The building or site itself may lie within the boundary of more than one authority.
County:
Greater London Authority
District:
Camden (London Borough)
Parish:
Non Civil Parish
National Grid Reference:
TQ 27847 85238

Details
CAMDEN
TQ2785SE SOUTHAMPTON ROAD 798-1/40/1475 (West side) 14/05/74 St Pancras Almshouses Nos.1-13 (consec) II

13 almshouses and committee room. Founded 1850 by Donald Fraser, MD and rebuilt 1859-63 by Henry Baker. Committee Room dated 1881. Yellow stock brick with red brick bands and diaper decoration. Slated roofs with cast-iron cresting, tall moulded brick chimney-stacks to each house and red brick dentil eaves treatment; No.13 with a fleche. EXTERIOR: 2 storey ranges round 3 sides of a courtyard; terminal houses (Nos 1 & 13), 2 storeys and gabled attics. Entrance to committee room in left hand corner, extending behind No.5. Nos 2-12, 2 windows each. Nos 1 & 13, both with 1 window projecting bays on road fronts, plus 1 window. Both with brick pointed arch porches in angles with main ranges; outer angles supported on columns and capitals. No.1 with bay windows at ground floor level. Main ranges have 5-centred arch doorways with panelled half glazed doors (2 pointed lights); bracketed gabled canopies with slate roofs and fleur-de-lys finials. Committee room entrance without canopy but having late C19 cast-iron bracket with C20 lamp. Windows to all houses gauged red and black brick 5-centred arches to recessed sashes of 2 pointed-head lights; windows over entrances similar but single light. INTERIORS: not inspected.
Listing NGR: TQ2784785238

Legacy
The contents of this record have been generated from a legacy data system.
Legacy System number:
478132
Legacy System:
LBS

Legal
This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Appendix 3

Location ringed in red: