

FLAT 5A, 28 ARKWRIGHT ROAD
LONDON, NW3 6BH

HERITAGE STATEMENT



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HS1 LISTING DESCRIPTION

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
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2					



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1.0 INTRODUCTION

- 1.1. This Heritage Statement has been produced by **heritage** unlimited to support an application for listed building consent at Flat 5A, 28 Arkwright Road, London and seeks to regularise works carried out by a previous owner of the property.
- 1.2. This application is being submitted following email correspondence with the local planning authority's Conservation Team Manager as the best way forward to deal with matter.
- 1.3. 28 Arkwright Road is a grade II listed building and situated within Redington Froggnal Conservation Area. The building is also attributed to a known architect – Robert A Briggs – and was constructed as a single dwelling until its conversion to flats in the 1950s by the local authority. Flats were eventually sold off to private owners however, the local authority retained the freehold until the early 21st century.
- 1.4. Listed buildings and conservation areas are defined by the National Planning Policy Framework (2021) (NPPF) as designated heritage assets. As the proposed development affects one or more heritage assets, paragraph 194 of the NPPF requires a Heritage Statement to support a planning application. This document has been prepared in accordance with the requirements of the NPPF.
- 1.5. The purpose of a Heritage Statement is to identify the significance of any heritage asset affected by the proposed development, the impact the alterations of the development will have upon the identified significance and justification for the proposed development. The Heritage Statement also needs to assess the proposed work in accordance with the statutory tests provided in the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.6. This Heritage Statement should be read in conjunction with architectural plans and other supporting documents, which form this planning application.
- 1.7. This report has been compiled by Paul Clarke BA (Hons) Arch Cons and is based on a site visit and desk-based research carried out in April 2023.

2.0 SITE LOCATION AND CONTEXT

- 2.1. 28 Arkwright Road is a large red brick building located on a corner plot to the north side of Arkwright Road. To the east of the property is Frogal Road which forms a crossroad with Arkwright Road and the property is a dominant feature of the junction, owing to its position, relative scale, and grand exterior.
- 2.2. Boundary treatment of the property to the two roads is provided by a red brick and incorporates decorated piers. Vehicle access is provided by three openings with two giving access to parking to the front of the building and one giving access to parking to the rear of the building.
- 2.3. The property is of red brick construction with brick and terracotta detailing and a tiled roof. The building has an irregular, asymmetrical design and is recognised for distinctive features including a three storey octagonal turret with ogee cupola and weathervane, ornate shaped fenestration including enriched aprons and fanlights, and use of rubbed and gauged brick, round arches, and Flemish gables.
- 2.4. Communal access into the building is via a front door beneath a round arch to the left of the turret on the south elevation. Flat 5a is a second (top) floor one bedroom residential apartment situated to the southeast corner of the building and includes the uppermost floor of the turret.
- 2.5. The surrounding area is primarily residential, consisting of late 19th and 20th century red brick properties, however a large, modern, low-rise, flat roofed building is situated on the opposing northeast corner of the junction and is occupied by University College School (UCS) Senior School and health and fitness businesses. The original public school building itself, c.1906-7 by Arnold Mitchell, located approximately 100m north, is also listed grade II. As the application relates to internal works only however, no further listed properties in the area will be impacted or assessed in later sections of this report.

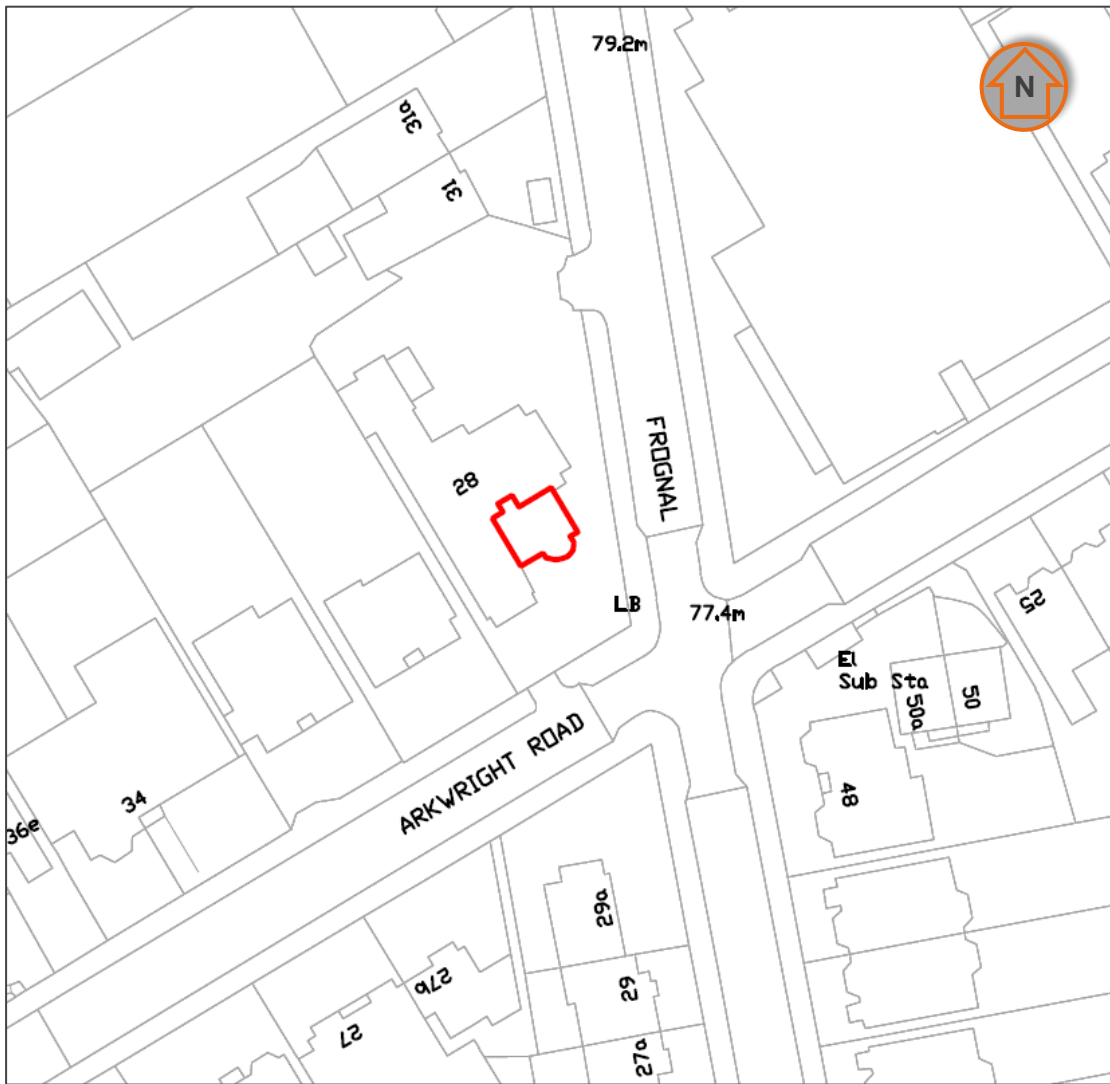


Fig.1: Site location shown in red.



Fig.2: The property seen looking northwest from the crossroads of Arkwright Road and Frognal. Flat 5a includes the second (top) floor of the turret and adjacent single window.



Fig.3: Access to southern side on Arkwright Road.

3.0 IDENTIFIED HERITAGE ASSETS

- 3.1. The National Planning Policy Framework (NPPF) requires that all heritage assets affected by the proposed development are identified and their significance, which includes setting, are described. The level of 'harm' the proposed works will have to the identified heritage assets also needs to be determined within the context of a Heritage Statement.
- 3.2. As identified in the introduction, the site is grade II listed as part of 'Number 28 And Attached Boundary Walls And Piers', and is situated within Redington and Frogna Conservation Area.

Flat 5A, 28 Arkwright Road

- 3.3. 28 Arkwright Road is a grade II listed building, designated in 1999, along with its boundary walls and piers.
- 3.4. The property was constructed c.1891 to a design by Robert A. Briggs, though it is not shown on the Ordnance Survey map of 1893. As described above, the red brick and terracotta property is a striking feature of the area, larger in scale than the neighbouring properties and with a considerably higher degree of external detailing and complexity in its design.
- 3.5. The property was originally a detached house occupying a large corner plot, however by the mid-1950s the land to the north had been developed to form two properties and the large single residence had been subdivided into multiple flats. As part of this process, internal works were required to form the new independent living spaces and a further extension was added to the property's rear (north) projection.
- 3.6. Robert Alexander Briggs, (1858-1916, London) , commonly known as R.A. Briggs, was an architect active in Dublin and London in the late 19th and early 20th centuries. Briggs was articled to Gilbert R. Redgrave in London between 1876 and 1879 and also attended the Royal Academy Schools and Architectural Association Schools around this time. From 1879 he then worked in the Dublin offices of G Moreing, Edward l'Anson, Lewis Henry Isaacs and Henry Louis Florence, Ernest Claude Ayton-Lee and J.J. O'Callaghan. Upon his return to London, he established an independent practice and was later in partnership with Charles Gordon Killmister and Harry Le Cronier Browning as Briggs & Browning from 1910 to 1913.

- 3.7. In 1882, Briggs was elected an Associate of the Royal Institute of British Architects (ARIBA), and a Fellow of the Royal Institute of British Architects (FRIBA) in 1892. He exhibited on numerous occasions between 1884-1910 at both the Royal Academy in London and the Glasgow Institute of the Fine Arts between. His works are numerous and can be found across the country, and whilst primarily residential, he is also attributed with a number of chapels and churches.
- 3.8. In addition to his many architectural projects, Briggs was also the author of a number of architecture books, including '*Bungalows and Country Residences*' (London: B.T. Batsford, 1891), earning him the nickname 'Bungalow Briggs'.



Fig.4: Ordnance Survey map, revised 1893, published 1895, prior to the development of the property.

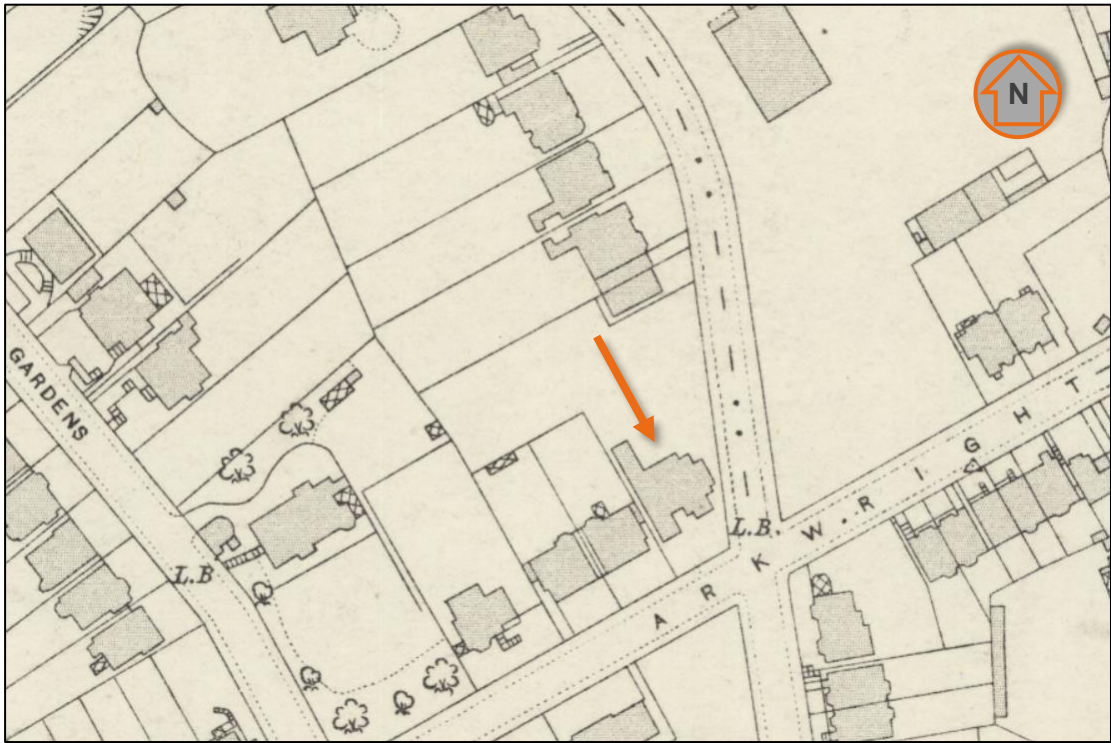


Fig.5: Ordnance Survey map, revised 1912, published 1915, the first map to show the property, then occupying a larger plot.

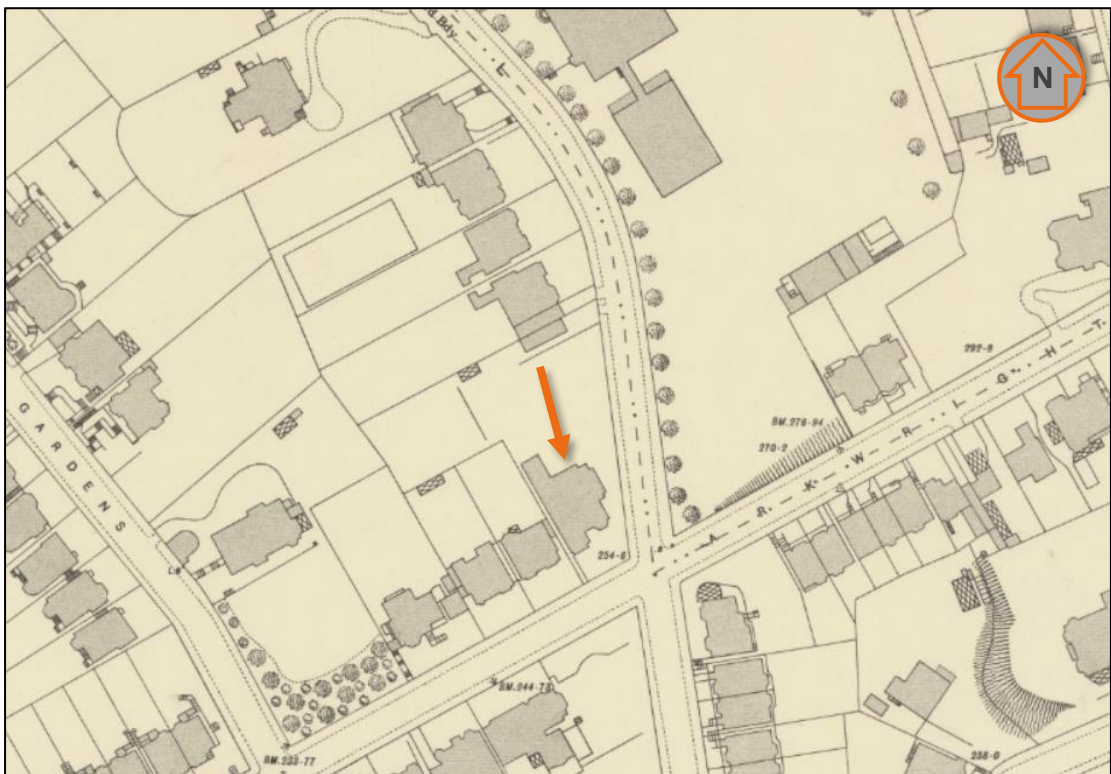


Fig.6: Ordnance Survey map, revised 1935, published 1936.

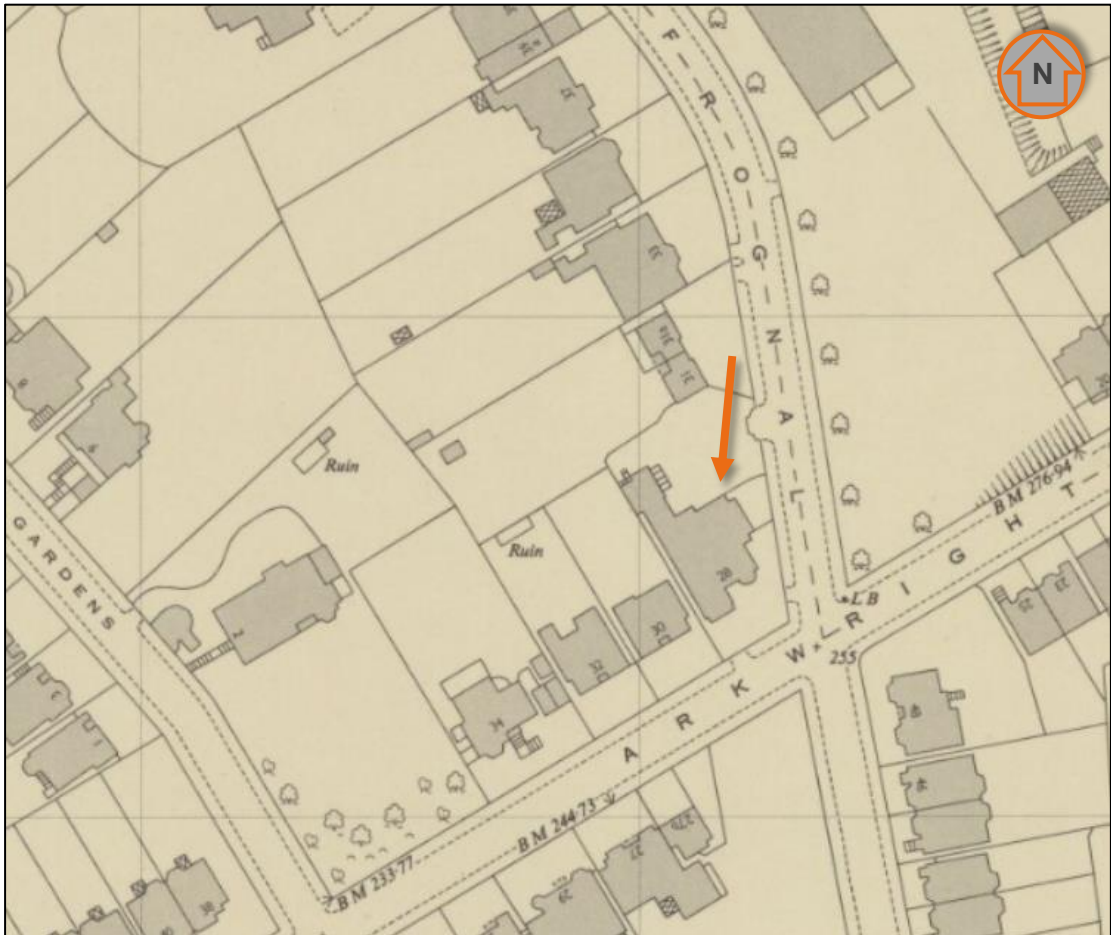


Fig.7: Ordnance Survey map, surveyed 1953, published 1954. The property is seen to be extended to the rear and the plot subdivided to develop two additional properties to the north.



Fig.8: Exterior of 28 Arkwright Road.



Fig.9: Internal view of shared main entrance door.



Fig.10: Interior view towards the front door of flat 5A with modern bathroom wall and door to the right.



Fig.11: The bathroom wall and small window adjacent to the front door to internal lightwell.



Fig.12: Hallway view of the modern bedroom wall, bathroom to left.



Fig.13: Modern bathroom, hallway cupboard, and bedroom wall.



Fig.14: Hallway and bathroom seen from living room door, kitchen to right and modern bedroom wall to left.



Fig.15: Living room partially formed by the top floor of the turret.



Fig.16: Ceiling detail of the turret in the living room.



Fig.17: The kitchen with alcove formed by the position of a former cupboard.



Fig.18: Bedroom window, overlooking Arkwright Road.



Fig.19: Modern bathroom.



Fig.20: Bathroom window to internal lightwell.

Redington and Froggal Conservation Area

- 3.9. Redington and Froggal Conservation Area was first designated in 1985, then extended in 1988 and 1992, with a boundary modification in 1992 when land was transferred to the neighbouring Fitzjohn's and Netherhall Conservation Area. A conservation area appraisal document was published in December 2022.
- 3.10. The area, which was laid out in the Victorian period (post 1870s), is primarily residential, though commercial, educational, and institutional uses are also found. Properties vary largely and include houses and mansion blocks, from three to six storeys, though are predominately constructed of red brick and draw from the Queen Anne Revival and Arts and Crafts styles. The landscape and pattern of development is characterised by smaller front gardens and larger front gardens, though both and the grass verges often feature mature trees planted at the time of original development.

3.11. As the proposed works are internal only, no impact will be caused to the exterior of the property or to the character and appearance of the conservation area. As such the conservation area will not be assessed in great detail in this or further sections of the report.

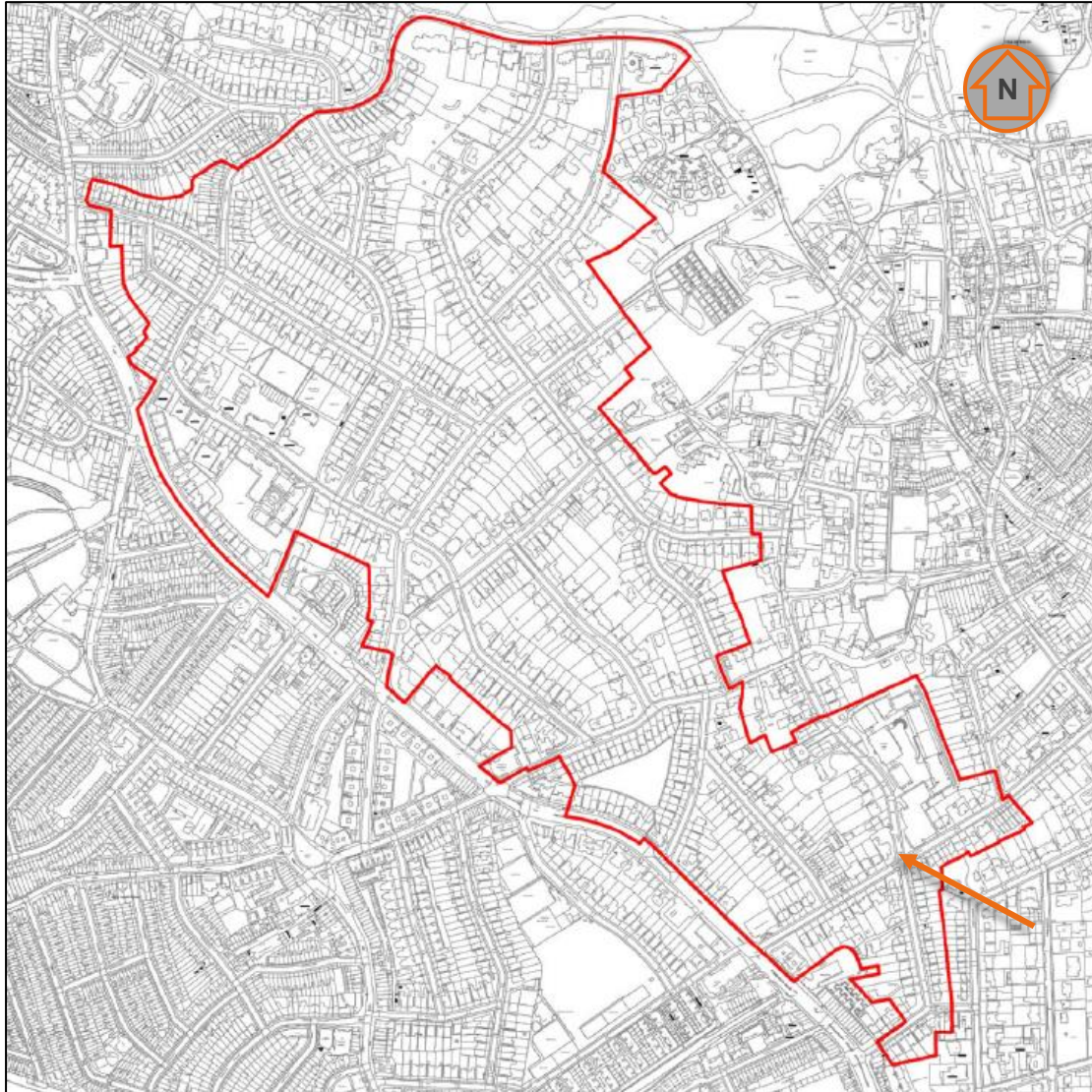


Fig.21: Redington and Frognal Conservation Area, the property is shown by the orange arrow.

4.0 PLANNING LEGISLATION AND POLICIES

Legislation

- 4.1. The legislative framework for the preservation and enhancement of listed buildings and conservation areas are set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Historic England, defines preservation in this context, as not harming the interest in the building, as opposed to keeping it utterly unchanged.
- 4.2. In 2014, a ruling by the Court of Appeal (Barnwell Manor Wind Energy Ltd v East Northants District Council, English Heritage and the National Trust) made clear that to discharge this responsibility, decision makers must give considerable importance and weight to the desirability of preserving the setting of listed buildings (and by implication other heritage assets) when carrying out the balancing exercise of judging harm against other planning considerations, as required under the National Planning Policy Framework.
- 4.3. Another ruling made in May 2017 by the Court of Appeal (Barwood Strategic Land II LLP v East Staffordshire Borough Council and the Secretary of State for Communities and Local Government), upheld a High Court ruling, that subordinates National Planning Policy Framework development presumptions to the statutory authority of an up-to-date local plan, as the NPPF is no more than ‘guidance for decision-makers, without the force of statute behind it. Paragraph 13 of the decision states, *‘The NPPF is the Government’s planning policy for England. It does not have the force of statute, and, ought not to be treated as if it did. Indeed, as one might expect, it acknowledges and reinforces the statutory presumption in favour of the development plan, and it also explicitly recognizes and emphasizes its own place in the plan-led system of development control. Its “Introduction” acknowledges that “[planning] law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise”, and that “[the NPPF] must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions”. Paragraph 12 recognizes that the NPPF “does not change the statutory status of the development plan as the starting point for decision making”. Paragraph 13 describes the NPPF, correctly, as “guidance for local planning authorities and decision-takers”, which, in the context of development control decision-making, is “a material consideration in determining applications”. Paragraph 215, in “Annex 1: Implementation”, says that “due weight should be given*

to relevant policies in existing plans according to their degree of consistency with [the NPPF] (the closer the policies in the plan to the policies in [the NPPF], the greater the weight that may be given)", but this too is guidance for decision-makers, without the force of statute behind it'.

- 4.4. Therefore, by implication, this judgment again emphasises the relative importance of sections 16 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in making planning decisions in relation to development that affects listed buildings and conservation areas.
- 4.5. Section 16(2) relates to an LBC application and states, 'In considering whether to grant listed building consent/ for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.
- 4.6. Section 72(1) relates to development affecting conservation areas and states, "In the exercise, with respect to any buildings or other land in a conservation area... 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area".
- 4.7. As a minimum, the tests provided in require the works to preserve the listed building or its setting and preserve the character or appearance of a conservation area.
- 4.8. Historic England defines preservation in this context as not harming the interest in the building, as opposed to keeping it utterly unchanged.

National Planning Policy Framework (2021)

- 4.9. As mentioned above, there is a need to carry out a balancing exercise of judging harm against other planning considerations as required under the NPPF. The NPPF sets out the Government's planning policies for England and how these are to be applied. The guiding principle of the document is a presumption in favour of sustainable development and the protection and enhancement of the historic environment is embedded in this approach.
- 4.10. Sustainable development is defined as meeting the needs of the present without compromising the needs of the future. Paragraph 8 of the NPPF breaks down this definition into three objectives: economic, social, and environmental. Within the environmental objective, sustainable development needs to contribute to 'protecting and enhancing our natural, built and historic environment'.

- 4.11. Paragraph 20 of the NPPF contains Strategic Policies, which provide an overall strategy for the pattern, scale and quality of development and make sufficient provision for the conservation and enhancement of the natural, built, and historic environment.
- 4.12. Section 16 of the NPPF contains policies relating to conserving and enhancing the historic environment. Within this section (paragraph 194), the Local Planning Authority requires the applicant to describe the significance of any affected heritage asset including any contribution made by their setting as part of an application.
- 4.13. Significance is defined in Annex 2 of the NPPF, as the value of a heritage asset to this and future generations because of its archaeological, architectural, artistic, or historical interest. Significance also derives not only from the asset's physical presence but also from its setting. Setting of a heritage asset is the surroundings in which the heritage asset is experienced, the extent of which is not fixed and can change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to significance of an asset.
- 4.14. Impact from a proposed development to the significance of a designated heritage asset needs to be evaluated, NPPF paragraph 199, states, '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'. NPPF paragraph 200 identifies that alteration, destruction, or development within the setting of a designated heritage asset can result in harm to, or loss of, the significance of the asset and that such loss requires a clear and convincing justification. Substantial harm to or loss of a grade II listed building should be exceptional and substantial harm or loss of grade I and grade II* listed buildings should be wholly exceptional.
- 4.15. NPPF Paragraphs 201 and 202 define the levels of harm as substantial or less than substantial. The National Planning Practice Guidance (PPG) provides useful guidance on assessing harm in relation to these definitions and gives the following example, 'In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting'. The PPG quantifies substantial harm (NPPF paragraph 201) as total destruction while

partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all. Anything less than total destruction needs to be evaluated on its own merits, for example, the removal of elements to an asset which themselves impact on its significance may therefore not be harmful to the asset. The PPG advises works that 'are moderate or minor in scale are likely to cause less than substantial harm (NPPF paragraph 202) or no harm at all'. However, it is important to consider each development in its own context as the PPG also identifies that minor works have the potential to cause substantial harm to the significance of an asset.

4.16. Paragraphs 201 and 202 refer to 'public benefit' as a means to outweigh the loss of or harm to a designated heritage asset. The PPG identifies that public benefit may follow many developments and as such this benefit could be anything that delivers economic, social or environmental progress which are the dimensions to sustainable development defined by NPPF Paragraph 8. The PPG states, 'Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefit'. Public benefits may include heritage benefits such as:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- Reducing or removing risk to heritage asset.
- Securing the optimum viable use of a heritage asset in support of its long-term conservation.

4.17. The three points above relate to NPPF Paragraph 197, which requires the Local Planning Authority to take these points into account when determining applications. Although, there is no defined list of public benefits, examples of public benefit for a designated heritage asset may include:

- The restoration of a listed building.
- The improved setting of a listed building.
- The enhancement of a conservation area.



Local Planning Policy

- 4.18. As well as legislation and national planning policies, the Camden London Borough Council Local Plan (2017) contains policies relating to the historic environment, including:

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

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

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

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

Conservation areas

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

The council will:

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

Listed buildings

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

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

London Plan (2021)

4.19. Also relevant to the application are policies contained in the London Plan (2021) and include:

Policy HC1 Heritage conservation and growth:

- A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
 - 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
 - 2) utilising the heritage significance of a site or area in the planning and design process
 - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
 - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

- C. 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.
- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and reuse.

5.0 ASSESSING SIGNIFICANCE

- 5.1. Significance of a heritage asset is defined by the NPPF as the value of a heritage asset placed on it by current and future generations because of its heritage interest. This interest may be archaeological; architectural; artistic or historical. The setting of a heritage asset also contributes to its significance and is defined by the NPPF as the surrounding in which a heritage asset is experienced. In comparison, Historic England's Conservation Principles (2008) uses evidential; aesthetic; historical and communal values to define significance. These different set of values have been combined for the purpose of this report.
- 5.2. Part 4 of British Standard 7913:2013 Guide to Conservation of Historic Buildings provides information on heritage values and significance. In context, this document states, 'A wide range of factors can contribute to the significance of a historic building. As well as physical components, significance includes factors such as immediate and wider setting, use and association (e.g., with a particular event, family, community or artist and those involved in design and construction)'.
- 5.3. Identifying the values of an asset allow us to understand the degree of significance and inform us of the potential impact the proposed works will have the heritage asset and its setting. These values may be tangible, the physical fabric of the building, capable of being touched, or view such as its landscape. Also, the value may be intangible through a past event or an association with a person.
- **Evidential (archaeological) value** relates to physical aspects of the site which provide evidence from the past. This can be with built form or below ground archaeology.
 - **Historical value** is the extent to which the asset is associated with or illustrative of historic events or people.
 - **Aesthetic (architectural/artistic) value** includes design, visual, landscape and architectural qualities.
 - **Communal value** includes social, commemorative, or spiritual value, local identity, and the meaning of place for people.

5.4. The assessment of significance draws upon information contained in the section on Heritage Assets and uses the values defined above to establish the level of significance detailed below:

- Features of the asset which contribute to the principal historical and architectural interest are considered to be of **high significance**.
- Features of the asset which noticeably contribute to the overall architectural or historical Interest and may include post construction features of historic or design interest are considered to be of **medium significance**.
- Features of the asset which make a relatively minor contribution to the historic and architectural interest are considered to be of **low significance**.
- Features which do not contribute to the historic and architectural interest of the asset, and in some cases may even detract from the significance are therefore considered to be either **neutral or detracting**.

Assessing Setting

5.5. The primary guiding document for assessing setting is The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (2017), produced by Historic England.

5.6. Setting varies from asset to asset and cannot be generically defined. Changes to the setting of heritage assets may be positive such as replacing poor development which has compromised the assets setting. It is likely that the setting of an asset has changed over time from the dynamics of human activity and natural occurrences such as weather.

5.7. The importance setting makes to the contribution to the significance of the heritage asset is often related to how the heritage asset is seen in views. This can include views looking towards the heritage asset or from the heritage asset looking outwards and may include relationships between the asset and other heritage assets, natural or topographical features. Assets may also be intended to be seen from one another in designed landscapes for aesthetic reasons.

- 5.8. Historic England's Good Practice Advice 3, The Setting of Heritage Assets (2017), notes a staged approach to proportionate decision-taking, with relevant NPPF paragraphs along with guidance contained in the National Planning Practice Guidance (PPG) for their implementation, providing the framework for the consideration of changes affecting the setting of heritage assets which should be assessed proportionately and based on the nature, extent, and level of the heritage asset's significance.
- 5.9. The Guidance recommends a five-step approach to the assessment of the effect of development on the setting of heritage assets as follows:

Step 1: identify which heritage assets and their settings are affected;

Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);

Step 3: assess the effects of the proposed development whether beneficial or harmful, on that significance;

Step 4: explore ways of maximising enhancement and avoiding or minimising harm;

Step 5: make and document the decision and monitor outcomes.

Assessing Significance

- 5.10. In order to assess and quantify the level harm to the significance of a heritage asset in context with the relevant Paragraphs in the NPPF, the Planning Policy Guidance (PPG), a web-based resource provides up-to-date guidance on NPPF policies. The PPG provides useful guidance on assessing harm in relation to Paragraphs 193 and 194 of the NPPF. The PPG states, '*in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting*'.

- 5.11. In defining what constitutes substantial harm, the PPG identifies that the impact of total destruction is obviously substantial harm while partial destruction is likely to have a considerable *impact* but, depending on the circumstances, may still be less than substantial harm or conceivably not harmful at all. Anything less than total destruction needs to be evaluated on its own merits, for example, the removal of elements to an asset which themselves impact on its significance may not be harmful to the asset.
- 5.12. The PPG advises works that *'are moderate or minor in scale are likely to cause less than substantial harm or no harm at all'*. However, it is important to consider each development in its own context as the PPG identifies that minor works have the potential to cause substantial harm to the significance of an asset. This would be so if for example the works removed an element which contributed to the assets special architectural or historic interest.

Significance of Flat 5A, 28 Arkwright Road

- 5.13. The significance of 28 Arkwright Road is derived from its association with prominent architect Robert Alexander Briggs and the comparatively high level of detailing in its design, which combined with its prominent position on the junction of Arkwright Road and Frognal, makes it a landmark building. The property was original constructed in the 1890s as a detached, single occupancy house, however it was subsequently split into multiple apartments in the 1950s, a process which resulted in changes to the interior layout and fabric of the building. This does not detract from the external appearance of the building however, which otherwise retains a high level of originality and condition.
- 5.14. As a grade II listed building, 28 Arkwright Road is a heritage asset considered to be of **medium significance**.

Significance of Redington and Frognal Conservation Area

- 5.15. The significance of Redington and Frognal Conservation Area is derived from its pattern of development and high quality, relatively large red brick Victorian and Edwardian properties which include detached houses and larger mansion blocks in Queen Anne Revival and Arts and Crafts styles. The character of the area is also contributed to by mature trees, some surviving from the initial development phases, and border treatments including hedges and brick walls. Redington and Frognal Conservation Area is a heritage asset considered to be of **medium significance**.



6.0 PROPOSED WORKS AND ASSESSMENT

Proposed Works

- 6.1. The application relates to the regularisation of internal works carried out by a previous owner without Listed Building Consent. However, they had obtained licence from London Borough of Camden, landlord of the property at the time, for alteration to the property. Paragraph 4 of the licence states: *The Tenant wishes to carry out the several alterations and works to the Premises detailed in the Schedule and in the Structural Calculations attached to this Licence (“the Works”). The landlord has agreed to formal consent for the Works upon the terms and subject to the conditions contained in this Licence.*
- 6.2. The works carried out under the aforementioned licence granted by the landlord – London Borough of Camden – relate to the alteration of a structural wall; making the bathroom smaller; enlarging the bedroom, which removed a partition wall to this room; and in turn created a new hallway and circulation pattern.

Impact

- 6.3. The removed fabric is believed to have been primarily non-original, relating to the mid-20th century conversion of the property from a single dwelling to apartments. As such, this fabric would not have contributed to the special architectural or historic interest of the building nor to the significance of the designated heritage asset. Consequently, it is considered that these works would cause **no harm or impact**.
- 6.4. As the works are internal and have **no impact** on the exterior of the property, the character and appearance of Redington and Frogna Conservation area is also unimpacted and **preserved**.
- 6.5. In summary, the works are not considered to have involved the removal or harm to historic or significant fabric with the new layout suitable and carried out to a high standard, sympathetic to the property. Should fabric of an historic wall have been partially removed, this is considered to be very limited and to no real detriment. Therefore, the works caused **no harm** and the special interest in the listed building and character and appearance of the conservation area are **preserved**.

7.0 CONCLUSION

- 7.1. Paragraph 195 of the NPPF advises Local Planning Authorities that the particular significance, including setting of any heritage asset is assessed. This document has concisely described the heritage assets affected by the proposed works and their significance.
- 7.2. The application relates to the regularisation of works carried out by a previous owner without Listed Building Consent but following the granting of a licence by the previous freeholder - London Borough of Camden. It is concluded that the fabric removed was primarily non-original and therefore of no significance, causing no harm. Similarly, the alteration to the previous circulation pattern also had no impact to the special interest in the building, as this was formed by the conversion of the property from a single dwelling to apartments in the mid-20th century. It should also be noted that the works were carried out to a high standard and are appropriate for the building and have no impact on the exterior, from which the building and conservation area derive the majority of their significance and character.
- 7.3. With regards to the development meeting the statutory test provided by Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the minimum aim is to preserve the setting; building; features of special architectural or historic interest of listed buildings. In this context the proposal **preserves** the setting and special interest of the listed building as the works are considered to have primarily concerned non-original fabric introduced during the conversion works of the 1950s, which is of no significance. Though minor change has occurred to the circulation pattern, again, the previous layout and pattern originated from the mid-20th century and not the original development in the late 19th century.
- 7.4. With regards to the test provided by 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is required as a minimum for development to preserve the character or appearance of a conservation area. In this context the works **preserve** the character and appearance of Redington and Froggnal Conservation Area as there was no impact to the exterior of the property.
- 7.5. It should be remembered that Historic England defines preservation in this context as not harming the interest in the heritage assets, as opposed to keeping them utterly unchanged.

- 7.6. With regards to NPPF paragraphs 199 to 202, as no harm will be caused to the designated assets, no public benefit is required.
- 7.7. In regard to local policy D2 Heritage and HC1 of the London Plan, as discussed above, these are met as the proposal preserves the setting and special interest of the listed building, character and appearance of the conservation area.
- 7.8. In conclusion, the works meet the requirements of the Planning (Listed Buildings and Conservation Area) Act 1990, the NPPF and local planning policies. It is therefore, requested that they be approved.



8.0 SOURCES

Ministry of Housing, Communities & Local Government (2021), *National Planning Policy Framework*.

Planning (Listed Buildings and Conservation Area) Act 1990

Ordnance Survey Maps (various dates)

Ministry of Housing, Communities & Local Government (2018) <http://planning-guidance.communities.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/> / National Planning Policy Framework (NPPF 2019 revision) / National Planning Policy Guidance (PPG 2019) / National Design Guide (2019)

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

Historic England (2008) *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

AHRnet Biographical Dictionary of British and Irish Architects 1800-1950 (n.d.) *Briggs, Robert Alexander 1858 – 1916* (Accessed June 2023)

Redington and Frognal Conservation Area Appraisal (2022)

Camden London Borough Council Local Plan (2017)

HS1

Listing Description

Listed Building Name	NUMBER 28 AND ATTACHED BOUNDARY WALLS AND PIERS
Address	NUMBER 28 AND ATTACHED BOUNDARY WALLS AND PIERS, 28, ARKWRIGHT ROAD
List Entry Number	1244684
Grade	II
Date First Listed	11 January 1999
Date Amended	N/A
National Grid Reference	TQ 26214 85254

Listing Description

CAMDEN

TQ2685SW ARKWRIGHT ROAD 798-1/37/56 (North side) No.28 and attached boundary walls and piers

II

Detached house. 1891. By Robert A Briggs. Red brick and terracotta. Tiled roofs with tall brick slab chimney-stacks. EXTERIOR: 2 storeys and attics. Asymmetrical design. Irregular windows. Central entrance has round-arched gauged brick heads on pilasters with enriched terracotta capitals; double panelled doors with shaped glazing and stained-glass fanlight. 1st floor 2-light oriel window with colonnette. Most windows have heads of a row of small panes below a rectangular window with inset rectangle surrounded by irregular stained glass; 1st floor with cambered bases to upper sashes. To right, a 3-storey octagonal turret, with enriched panelled window aprons and mullions, terminating in an ogee copper cupola with weathervane. Left hand has bay window of 3 windows to each floor, the 1st floor central window being round-arched. 4-light attic window in shaped gable. Right hand return to Frogmal has large Flemish gable, the whole bay being enriched in gauged and rubbed brick and terracotta in Queen Anne style; ground floor central window has large open pediment. To right, a tented balcony. INTERIOR: not inspected. SUBSIDIARY FEATURES: attached boundary walls of brick and terracotta; panelled piers with inset terracotta swag plaques.



understanding

heritage

to inform

change