



Historic England

Ms Miriam Baptist
London Borough of Camden
Development Management
Town Hall, Judd Street
London
WC1H 9JE

Direct Dial: [REDACTED]

Our ref: L01561324

21 June 2023

Dear Ms Baptist

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**114 FLAT 1ST AND 2ND FLOOR HEATH STREET LONDON CAMDEN NW3 1DR
Application Nos 2023/2319/L & 2023/1036/P**

Thank you for your letters of 1 June 2023 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist you in determining the applications.

Summary

No. 114 Heath Street is one of a pair of early Georgian houses retaining characterful original elements, including a large chimneystack, a weatherboarded rear elevation, and a pitched roof which has been altered by a poorly-designed modern dormer window. The proposals are for a major engineering intervention entailing demolition of much of the chimneybreast and other intrusive works, which go beyond the remedial recommendations of the submitted structural analysis of the building's failings. Policy requires the avoidance of harm to the significance of listed buildings. The application should be withdrawn or entirely revised with the input of conservation-specialist engineers and designers to achieve the remedial work needed with minimal harm, and otherwise to propose only clearly and convincingly justified alterations.

Historic England Advice

Significance of the building

Nos. 112 & 114 Heath Street are a terraced pair of vernacular timber-framed houses probably dating to the first half of the 18th century, standing in a terrace on Heath Street, an old thoroughfare out of London, in the Hampstead Conservation Area. No. 112 has a modern weatherboarded front façade with small parapet and a brick rear



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elevation which has been extended by one sheer storey to accommodate a rear roof extension. No. 114 retains a form closer to the original, with a rendered front façade under the eaves of a pitched slated roof and a weatherboarded rear façade with large outrigger. The houses share a large chimneystack on the party wall, and both have flush-framed sashes. Neither ground-floor shop is of any interest, however, and both have modern dormers. Despite their alteration, for their vernacular style and construction, their age and survival, they have considerable special interest

Impact of the proposals on significance

There are notable apparent discrepancies between the findings of the Structural Report (Allan Goldstein Engineers Ltd., October 2022) and their implications, and the structural and architectural proposals. The structural proposals indicate the insertion of large new steel members into the first-floor ceiling/second-floor floor structure, as well as vertical members on the party wall at the cost of the historic chimneybreast. These works would harm the building, as detailed below, but are also presented without supporting justification.

There are also discrepancies between some of the drawings themselves and a lack of adequate information in the application documents on significance. The architectural sections and structural drawings state that the main staircase would be replaced new, although elsewhere in the plans it is suggested that only overcladding would take place. The age and significance of the existing staircase is unclear; however the replacement of any staircase of traditional construction in this location risks causing harm by loss of historic fabric. Similarly the proposed replacement of windows may be harmful, but there is inadequate information regarding the significance of those existing to be able to assess this.

Some of the proposals are unambiguously harmful. The Structural Report notes no concerns about the condition of the large corner chimneybreasts on the party wall, yet this stack is to be entirely demolished at first-floor level and largely demolished at second-floor level, to be replaced with structural steels. This destruction of a principal and characterful element of the traditional building, integral to its original structural design, would be profoundly harmful, and no justification is provided. The insertion of steels in the first-floor ceiling/second-floor floor structure could have a harmful impact on room volumes and finishes, even if justified.

The claimed heritage benefit of matching the non-original appearance of the other house in the pair, No. 112, is not evident.

Relevant policy context

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes a statutory duty for decision makers to pay special regard to the desirability of preserving



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the special architectural and historic interest of listed buildings and their settings. This is interpreted in the National Planning Policy Framework (NPPF) (2021), which recognises heritage assets as an irreplaceable resource the protection of which is integral to its presumption in favour of sustainable development. The NPPF requires local planning authorities to give great weight to a designated heritage asset's conservation wherever proposals may cause harm to its significance. Where harm is proposed it must be clearly and convincingly justified, and ultimately outweighed by the delivery of public benefits (paragraphs 199-202). Conflict between proposals and conservation of heritage assets' significance should be avoided or minimised (paragraph 195).

The London Plan (2021) and Camden's Local Plan (2017) support these policies for preserving listed buildings from harm. Camden's Policy D2 on heritage notes at part j. that the Council will "resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building", which will need to be convincingly outweighed by public benefits in order to be acceptable.

Historic England's position on the proposals

The Structural Report is clear that failures are located at second-floor ceiling level and above, and result chiefly from the inadequate design of a dormer structure that has been inserted within the roof, put under stress by the subsequent occupation of this floor. It is also clear that water ingress is chiefly the result of one area of defective flashing. There is an evident need for considerable remedial structural work at roof level; however there is no intrinsic justification for total alteration of the upper storeys and roof form, nor for demolition of other elements of the interior.

The proposed extension and introduction of structural steels will considerably increase the weight of the upper storeys of the building. The proposed introduction of steel beams at first-floor ceiling level and vertical structural members on the party wall - which is the only apparent rationale for the proposed demolition of chimneybreast - goes well beyond the recommendations of the Structural Report, and so appears to have the purpose of enabling the proposed extension. Notwithstanding this structural design, the addition of such considerable weight above a modest building of traditional construction which is already under strain may have long-term implications for the lower storeys of the building, and this is not analysed in the application documents.

The harm that would be caused by the proposed demolition of the historic chimneybreasts and large parts of the historic roof structure would be very serious for this fabric and construction of special interest and for the whole character of the house as a listed building. There is no justification for this harm in the structural analysis provided, and beyond this its impact on significance has not been assessed. These impacts are unlikely to be acceptable.



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In general, the application documents do not describe the significance of the building with level of detail nearly adequate to understand the potential impact of the proposals on its significance, as required by paragraph 194 of the NPPF. Discrepancies the application documents and a lack of analysis and justification in the Design and Access Statement of many of the large number of alterations indicated in the drawings. There is a particular lack of analysis of the interior fabric of the building and its significance. The input of a suitably qualified conservation professional and of engineers with experience of remedial works to listed buildings of traditional construction is desirable.

Recommendation

Historic England has serious concerns regarding the applications on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 195 to 202 of the NPPF.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

For the reasons set out in this letter Historic England is unable to authorise or direct as to the granting of listed building consent which is required in order for your Authority to grant consent. We therefore recommend these applications are refused or withdrawn.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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