



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 September 2023

Dear Ms Baptist

**Arrangements for Handling Heritage Applications Direction 2021**

**114 FLAT 1ST AND 2ND FLOOR HEATH STREET LONDON CAMDEN NW3 1DR  
Application No. 2023/2319/L**

Thank you for your letter of 14 September 2023 regarding further information on the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your Authority in determining the application.

**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 amended proposals would still make major alterations including a roof extension 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. Notwithstanding amendments which have reduced the scope of proposals, the applications should be withdrawn or entirely revised with the input of conservation-specialist engineers and designers to achieve the remedial work needed with minimal harm, and otherwise to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 designated heritage asset

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. Their original forms are discernible and both retain much of their original fabric, though both



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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

Since the original submission of the applications, the proposals have been amended chiefly by omission of the proposed demolition of the chimneystack. The proposed roof extension has also been redesigned and slightly reduced in scale, although the additional floorspace to be formed would be comparable in size.

The revised drawing pack leaves a great deal of ambiguity about the alterations proposed. An alternative structural design for the roof extension, without alteration of the chimneystack, is not detailed. The extensive annotations on the original drawing pack are largely omitted.

The major alteration of the roof form still proposed remains likely to be considerably harmful to significance. Ambiguity about its structural design and other alterations to layout and fit-out in the interior suggest that other works proposed are also likely to harm fabric or plan-form of significance. The proposed addition of insulation, new windows, new roof fabric and other alterations would all require careful detailing to avoid harm and ensure significance is conserved, but no such detail is provided.

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

#### Relevant planning 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 the special architectural and historic features of listed buildings and their settings. This is interpreted in the National Planning Policy Framework 2021 (NPPF), 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.



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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 application still lacks an adequate exploration of the building's significance, which needs to be sufficient in detail to inform the proposals, as required by paragraph 194 of the NPPF. In the absence of this, the Structural Report (Allan Goldstein Engineers Ltd., October 2022) remains the best guide to the remedial works needed to conserve the building and its significance as part of any proposed development. The conclusions of this report suggest that only a more modest degree of alteration to the roof structure than is proposed would be justified by the existing condition of the building. No convincing justification has been presented for the wider package of proposals.

Some of these proposals may be acceptable in principal, such as the addition of insulation, or the replacement of windows that are inappropriate or can't be repaired with appropriately detailed new ones. In such cases, acceptability depends on the avoidance of harm and the conservation of significance, which is a matter of detailed design and specification which is overlooked in the application documents. Such details might be left to condition in the context of a justified package of proposals, but as in other respects, that justification is lacking in these applications.

The degree of alteration proposed would harm the building's significance by loss of form and fabric which contribute to its character as a listed building. Without justification, or evidence of countervailing public benefits, including convincing heritage benefits, this harm should not be permitted.

It remains the case that the proposals seem to suffer from the lack of a suitably qualified conservation professional and of engineers with experience of remedial works to listed buildings of traditional construction. We continue to recommend that the applications are withdrawn or refused unless adequate evidence, justification and detail are provided or the proposals are considerably reduced in their scope.

#### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 194-202.

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have



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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 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 that this application is 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

**Alfie Stroud**

Inspector of Historic Buildings and Areas

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