



**101 BAYHAM STREET, CAMDEN  
HERITAGE TOWNSCAPE AND VISUAL ASSESSMENT**

**Project**

101 Bayham Street, LB Camden

**Client**

Railpen

**Architects**

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20 September 2023

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# 1. Introduction

1.1 This report has been prepared for Railpen (the 'Applicant'). It presents the findings of an assessment of the effects of the development proposals (the 'Proposed Development'), at 101 Bayham Street, (the 'Site') within the jurisdiction of the London Borough of Camden (LBC), on townscape, visual amenity, and the heritage significance of above ground heritage assets. The Heritage, Townscape and Visual Impact Assessment (HTVIA) was undertaken by The Townscape Consultancy (TTC), a practice that provides independent expert advice on architecture, urban design, townscape and heritage.

1.2 The area highlighted in red in Figure 1.1 illustrates the approximate Site location.

1.3 The Proposed Development, designed by Henley Halebrown (the 'Architects'), consists of the following:

- *'Alterations and refurbishment to existing building. Works to include installation of new 'Brise-soleil' screening at fourth floor, installation of new ground floor entrance door on Bayham Street/front façade, rear infill extension at fourth floor, insertion of new window to first floor of rear façade, infilling of windows to rear façade, replacement plant equipment at roof level, and associated works.'*

1.4 TTC has collaborated with the Architects during the design development process. It has undertaken baseline research into the Site and surrounding built context, sharing initial assessments with the Architects and providing design feedback from a heritage, townscape, and visual impact perspective. This has been done in an iterative manner, using 3D computer models of the Proposed Development within its existing and emerging context.

1.5 This HTVIA considers the impact of the Proposed Development on the significance of relevant above-ground heritage assets (HAs) in light of policy and guidance set out in the NPPF and development plan policy. It also considers the visual impact of the Proposed Development on the townscape of the area around the Site, analysing the character of the surrounding townscape, and assessing the effect of the Proposed Development on views from locations around the Site.

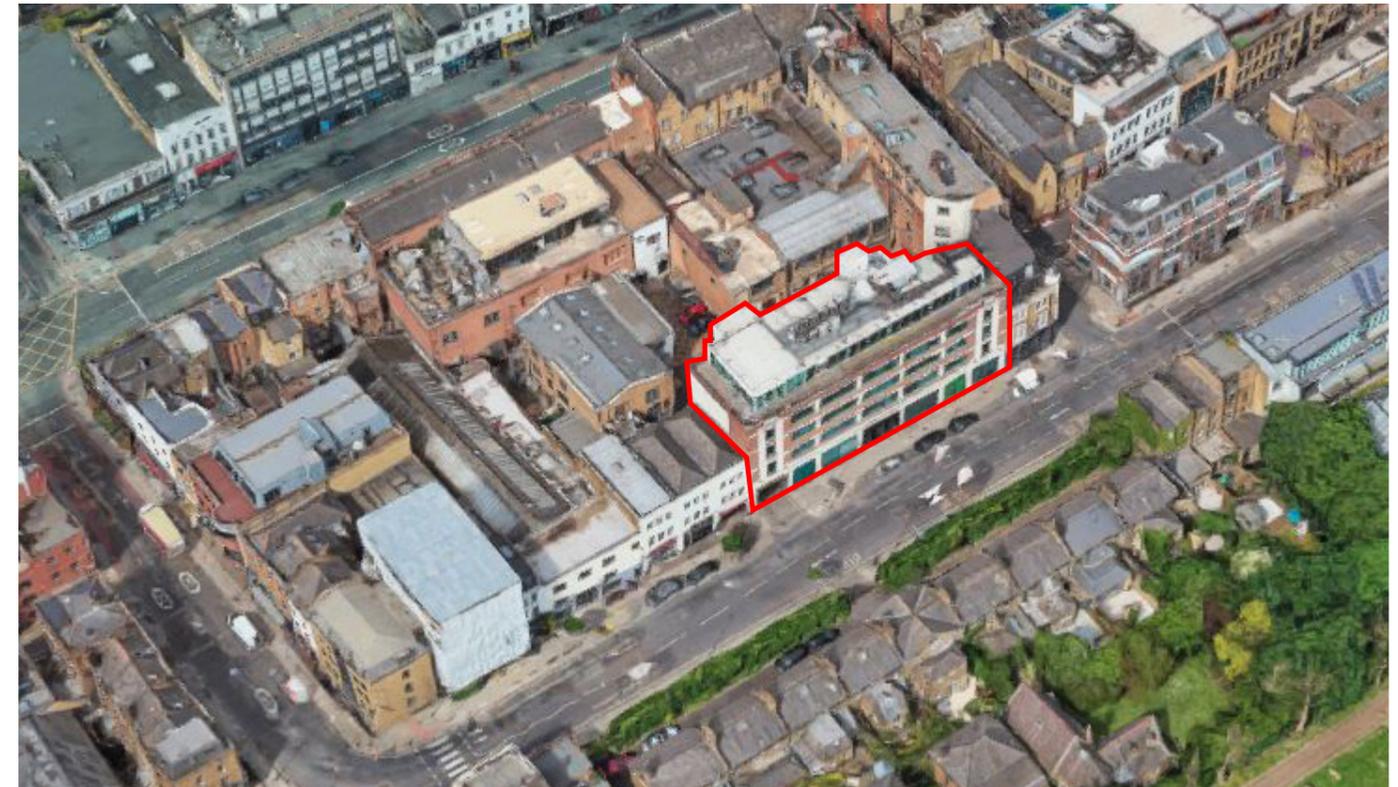


Figure 1.1: Aerial photograph showing the approximate location of the site outlined in red.



1.6 The HTVIA sets out:

- TTC's methodology for assessment in Chapter 2;
- Relevant statutory duties as well as design and historic environment policy and guidance in Chapter 3;
- The historic development of the Site and its surroundings in Chapter 4;
- A description of the Site and its context in Chapter 5;
- A description and assessment of the architectural and urban design quality of the Proposed Development in its local townscape in Chapter 6;
- Identification of relevant HAs pertaining to the Site and in the area around it, including relevant heritage designations (type and grade) and Statements of Significance for identified HAs in line with NPPF paragraph 194 and an assessment of the effect of the Proposed Development on the settings of identified heritage assets in Chapter 7. The assessments of effect on heritage significance are undertaken with regard to the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and in the context of national and local policy and guidance;
- Consideration of the visual effect of the Proposed Development from 4 viewpoints in Chapter 8; and
- Conclusions in Chapter 9.

1.7 The proposed views contained within Chapter 8 of this HTVIA have been prepared by the architects as drawn images using computer model images from locations matching the existing photography.

1.8 This report will be submitted as part of the planning application and should therefore be read alongside other planning documents within this submission, including Design and Access Statement (DAS) produced by the architects.

## 2. Methodology

2.1 This HTVIA considers the visual impact of the Proposed Development on the townscape of the area around the Site. It analyses the character of the surrounding townscape and assesses its effects on views from locations around the Site (see below regarding the selection of viewpoints). It also considers the impact of the Proposed Development on the significance of relevant above-ground heritage assets (HAs) in light of policy and guidance set out in the NPPF and development plan policy. Below ground archaeology is not considered in this report.

### Method of Assessment – Townscape and Visual

2.2 The current condition of the Site and the surrounding area were ascertained by site visits, supported by a study of archival materials, maps, and aerial photographs. Record photographs were taken on site visits allowing the accuracy of record data to be verified.

2.3 Buildings, open spaces, townscape, and views that have the potential to be affected by the Proposed Development, particularly those that have been previously identified as significant by designation or in other ways, are identified through this process. The study area is formed of those areas around the Site on which the Proposed Development could have a significant effect in townscape terms, informed by site visits and desk study as outlined above, as well as testing of the visibility of the Proposed Development using Vu.City (a digital visualisation tool).

2.4 The effects on these buildings, open spaces, townscape and views are studied, by the designers of the Proposed Development in collaboration with the authors of the HTVIA, as part of the process of developing the design. This process includes digital modelling of the designs as they are developed, so that the visual impact can be tested.

2.5 The impacts of the Proposed Development, in the form in which it is submitted for planning permission, on the townscape and views are assessed by the townscape assessors. This assessment is informed by images showing 'as existing' and 'as proposed' views from selected viewpoints.

### Identification of viewpoint locations

2.6 A study was undertaken to establish a set of potential viewpoint locations from which 'before and after' views are provided. The study area is centred on the Site and is limited to locations from which the Site can be seen, or from which new buildings on the Site would be seen.

2.7 Within this study area, four types of viewing location, all publicly accessible, were identified:

- Views that have been identified as significant, by LBC or others (for example, the GLA), i.e. in planning policy and guidance documents and conservation area appraisals;
- Other locations or views of particular sensitivity,

including those viewpoints in which the Proposed Development may significantly affect the settings of heritage assets;

- Representative townscape locations from which the Proposed Development will be visible; and
- Locations where there is extensive open space between the viewer and the Proposed Development so that it will be prominent rather than obscured by foreground buildings. This includes areas of open space that are important in a local context, e.g. for leisure purposes.

2.8 The set of viewpoints was chosen to cover:

- A representative range of viewpoints from different directions from which the Proposed Development will be visible;
- A range of distances from the Site; and
- Different types of townscape area.

2.9 Possible locations in these categories within the study area were identified based on an examination of maps and aerial photographs; the documents referred to above; and maps of conservation areas and maps and lists of listed buildings. The study area and the possible locations were then visited to establish candidate viewpoints. A photographic record was made of this visit together with a map showing photo locations. The viewpoint locations and view type (render or wireline) have been determined in consultation with LBC officers.

### Assessment

2.10 For identified views illustrated in Chapter 8 of this HTVIA, there are images of the view as existing as photographs and as proposed drawn images produced by the architects. The proposed drawn images are based on three-dimension model representation from the viewpoint location matching the photograph. These drawings illustrate the degree to which the Proposed Development will be visible and the form.

2.11 The assessment of individual views, and the section concerning impact on townscape, which is informed by the view assessments, considers the effect on the townscape and views as they will be experienced by viewers in reality. Photographic or drawn images of townscape are no more than an approximation to this, for a number of reasons:

- Viewers have peripheral vision; their view is not restricted by borders as an image is. They can move their eyes and heads to take in a wide field of view when standing in one place;
- Viewpoints themselves are not generally fixed. Townscape is experienced for the most part as a progression of views or vistas by people who are moving through streets or spaces rather than standing still;



### Method of Assessment – Heritage

- Images do not reflect the perception of depth of field as experienced by the human viewer due to parallax and the mechanics of capture devices;
  - Before and after views illustrate the view in conditions that are particular in respect of time of day and year, daylight and sunlight, and weather. The view will appear differently to varying degrees when any or all of these things vary; and
  - Townscape is experienced not by the eye alone but by the interpretation by the mind of what the eye sees, considered in the light of experience, knowledge and memory.
- 2.12 The 'as proposed' images are provided as a guide to the effect on views as they would be experienced on Site; to act as an aide-memoire; and to assist site visits. The assessment provided in this HTVIA represents a professional judgement of the likely effect of the Proposed Development on the view or the townscape, informed by site visits as well as the photographic and drawn images provided, rather than an assessment of the photographic images.
- 2.13 HAs have been identified using information derived from the National Heritage List for England website ([historicengland.org.uk/listing/thelist](http://historicengland.org.uk/listing/thelist)) and the Local Planning Authority website ([camden.gov.uk/planning](http://camden.gov.uk/planning)). The HAs comprise relevant designated conservation areas (CAs) and listed buildings (LBs). This process also identifies any relevant non-designated HAs that have been included on the Local Planning Authority's Local List which include Locally Listed buildings (LLBs).
- 2.14 The Site falls within the Camden Town Conservation Area. The building is not locally listed but is considered a positive contributor to the conservation area. The heritage assessment therefore considers the direct effect on the conservation area in which the Site lies by assessing the effect of the Proposed Development on the heritage significance. The report also considers the indirect effects arising from the Proposed Development i.e. on the setting of heritage assets in the area around the Site, including those elements of setting, if any, that contribute to the heritage significance of heritage assets. Assessments are carried out in line with HE guidance documents as set out in Chapter 3.
- 2.15 In line with NPPF paragraph 194, these assessments are considered to be proportionate.

### Study Area

- 2.16 The initial study area for this assessment extended 250m from the centre of the Site for both designated HAs and non-designated HAs. The extent of the study area took into account the dense urban context of the Site and was informed by site visits, consideration of the effect of existing buildings of similar height and scale to that of the Proposed Development in the area, and testing of the visibility of development of the scale proposed for the Site informed by material produced by the project visualiser.

### Method of Baseline Data Collection

- 2.17 A heritage receptor is defined as a feature, site, or area which has the potential to be affected by a Proposed Development, either directly or indirectly - in this instance, an HA.
- 2.18 The process of collecting baseline data involved identifying the relevant HAs included in the following documentary and mapping resources:
- Historic England on-line National Heritage List for England;
  - Statutory List of Buildings of Special Architectural and Historic Interest;
  - Local Plan Documents and other guidance (including CA appraisals);

- 2.19 Identification of heritage receptors involved a desktop survey to identify relevant HAs on the Site and in the area around it. It has included consideration of:
- National and local heritage policy and guidance;
  - The existing effects of the Site, including intervisibility between the Site and receptors;
  - The physical characteristics of the Site's context, including the effect of existing large scale buildings in the area around the Site; and
  - The nature of the Proposed Development.
- 2.20 Site visits were undertaken to check the desktop assessment with regard to the potential significance of the effect of the Proposed Development on the HAs within the surrounding area (and to check for any additional HAs that were not originally identified).
- 2.21 Listed building descriptions can be found on the National Heritage list for England and on Historic England's website. CA boundary maps can be found on the local planning authority websites.

## 3. Policy and Guidance

3.1 This Chapter sets out the relevant national, regional and local planning policy and guidance. For the purposes of this assessment, it is those policies relating to townscape and the historic environment that are of most relevance.

### STATUTORY DUTIES

3.2 The legislation set out below is relevant to this assessment:

- The Planning and Compulsory Purchase Act 2004
- The Town and Country Planning Act 1990
- The Planning (Listed Buildings and Conservation Areas) Act 1990

### Relevant changes proposed as part of the Levelling-up and Regeneration Bill

3.3 The Levelling-up and Regeneration Bill was introduced to Parliament on 11 May 2022 and is now at report stage in the House of Lords. It includes (at section 96(1)) a new, proposed section 58B, *'Duty of regard to certain heritage assets in granting permissions'*, to be inserted into the Town and Country Planning Act 1990. This provides (in sub-section (1)) as follows: *'In considering whether to grant planning permission or permission in principle for the development of land in England which affects a relevant asset or its setting, the local planning authority or (as the case may be) the Secretary of State must have special regard to the desirability of preserving or enhancing the asset or its setting.'* This includes *'preserving or enhancing any feature, quality of characteristic of the asset or setting that contributes to the significance of the asset'* (sub-section (2)). *'Relevant assets'* and their *'significance'* are identified in sub-section (3).

### The Planning (Listed Buildings and Conservation Areas) Act 1990

#### Listed Buildings

3.4 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act) states that, when considering applications for planning permission which affect a listed building or its setting, local authorities should 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.

#### Conservation Areas

3.5 Section 72 of the 1990 Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

### PLANNING POLICY

#### National planning policy and guidance

#### The National Planning Policy Framework, 2023

3.6 The Government issued the latest version of the National Planning Policy Framework (NPPF) in September 2023. The NPPF sets out planning policies for England and how these should be applied.

3.7 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three overarching objectives; economic, social and environmental. The NPPF states, at paragraph 10, that *'at the heart of the Framework is a presumption in favour of sustainable development.'*

#### NPPF Section 12: Achieving well-designed places

3.8 Section 12 of the NPPF deals with design. At paragraph 126, the NPPF states that *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*

3.9 Paragraph 130 notes that *'Planning policies and decisions should ensure that developments:*

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*



- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*
- 3.10 Paragraph 132 states that: *'Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'*
- 3.11 Paragraph 134 states that *'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'*. It goes on to say that *'Conversely, significant weight should be given to:*
- a) *development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- b) *outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*
- 3.12 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.
- 3.13 Heritage assets are defined in Annex 2 of the NPPF 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*
- 3.14 The NPPF notes, at paragraph 189, that heritage assets *'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'*
- 3.15 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 194). It goes on to say that *'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.'*
- 3.16 The NPPF identifies four key factors that local authorities should take into account in determining applications (para 190):
- a) *'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) *opportunities to draw on the contribution made by the historic environment to the character of a place.'*
- 3.17 Paragraph 199 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that *'this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*
- 3.18 The setting of a heritage asset is defined in Annex 2 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.'*
- 3.19 Paragraph 200 of the NPPF 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.
- 3.20 The NPPF states, at paragraph 201, that where a proposed development would lead to *'substantial harm'* or total loss of heritage significance of a designated heritage asset, consent should be refused, *'...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 a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the Site.
- 3.21 Paragraph 202 states that where a development proposal will lead to *'less than substantial'* harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Legal judgements have confirmed that considerable importance and weight should be placed on the impact of development on heritage assets or their settings when undertaking the requisite balancing exercise.
- 3.22 Paragraph 203 states the effect of an application on the significance of a non-designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.
- 3.23 The NPPF requires local planning authorities to look for opportunities for new development within conservation areas and World Heritage Sites (WHSs) and within the setting of heritage assets to enhance or better reveal their heritage significance. Paragraph 206 goes on to say: *'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.'*
- 3.24 Paragraph 207 states *'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance'* and that *'Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area ... should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area [...] as a whole'*.
- Planning Policy Guidance**
- 3.25 The national Planning Practice Guidance (PPG) was launched on the 6th March 2014 and provides a web-based resource in support of the NPPF. It is updated on an ongoing basis, and the parts cited below are current at the time of writing.
- 3.26 The PPG includes a section called 'Design: process and tools' which *'provides advice on the key points to take into account on design'*. This was issued on 1 October 2019; it replaces a previous section called 'Design'.
- 3.27 The PPG deals with the processes of the planning system with respect to design, and notes that guidance on good design is set out in the National Design Guide.

- 3.28 The PPG includes a section called 'Historic environment' which was updated on 23 July 2019. It explains which bodies are responsible for the designation of HAs and provides information on heritage consent processes.
- 3.29 The PPG considers the factors that should inform decision taking about developments that would affect HAs. It notes that 'HAs may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a HA, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals' (18a-007-20190723). It goes on to say 'understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm' (18a-008-20190723). It states that in assessing proposal, where harm is found, the extent of harm should be 'clearly articulated' as either 'substantial' or 'less than substantial' (18a-018-20190723).
- 3.30 The PPG notes that setting is defined in the NPPF and that 'all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent' (18a-013-20190723). It goes on to say, 'the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each' (18a-013-20190723).
- 3.31 With regard to non-designated HAs, the PPG notes that 'there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.' It states 'it is important that all non-designated heritage assets are clearly identified as such' noting it is 'helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies' (18a-040-20190723).
- The National Design Guide**
- 3.32 The National Design Guide (January 2021) ('NDG') states (paragraph 3) that it 'forms part of the Government's collection of planning practice guidance'.
- 3.33 At paragraph 21 the NDG states that well-designed places are achieved by making the right choices at all levels, including:
- 'The layout (or masterplan)
  - The form and scale of buildings
  - Their appearance
  - Landscape
  - Materials; and
  - Their detailing'
- 3.34 At paragraph 35 the NDG sets out ten characteristics which contribute to the character of places, nurture and sustain a sense of community, and address issues affecting climate. These are described as follows:
- 'Context - enhances the surroundings.
  - Identity - attractive and distinctive.
  - Built form - a coherent pattern of development.
  - Movement - accessible and easy to move around.
  - Nature - enhanced and optimised.
  - Public spaces - safe, social and inclusive.
  - Uses - mixed and integrated.
  - Homes and buildings - functional, healthy and sustainable.
  - Resources - efficient and resilient.
  - Lifespan - made to last.'
- Historic England Advice Note 1 (Second Edition) - Conservation Area Appraisal, Designation, and Management (2019)**
- 3.35 This note gives advice on managing conservation areas so that the potential of historic areas which are worthy of protection is fully realised, and provides information on conservation appraisals. The note emphasises that evidence required to inform decisions should be proportionate to the importance of the asset.
- 3.36 It suggests a number of questions to assess the value of an unlisted building to the significance of a conservation area, provided its historic form and values have not been eroded. Any one of these characteristics could provide the basis for considering that a building may make a positive contribution to the special interest of a conservation area, i.e. its significance, subject to consideration of whether or not these values have been compromised. The questions are listed below. Appendix A to this report provides an assessment of the contribution of the buildings on the Site against this guidance.
- 'Is it the work of a particular architect or designer of regional or local note?
  - Does it have landmark quality?
  - Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?
  - Does it relate to adjacent designated heritage assets (DHA) in age, materials or in any other historically significant way?
  - Does it contribute positively to the setting of adjacent designated heritage assets?
  - Does it contribute to the quality of recognisable spaces, including exteriors or open spaces with a complex of public buildings?
  - Is it associated with a designed landscape e.g. a significant wall, terracing or garden building?
  - Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?
  - Does it have significant historic association with features such as the historic road layout, burgage plots, a town park, or landscape feature?
  - Does it have historic associations with local people or past events?
- Does it reflect the traditional functional character or former uses in the area?
  - Does its use contribute to the character or appearance of the area?'
- Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (2015)**
- 3.37 This guidance, published by Historic England, provides information to assist in the implementation of historic environment policy in the NPPF and the related guidance given in the PPG. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
- 3.38 The guidance notes at paragraph 4 that 'The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest'.
- 3.39 At paragraph 5, it is stated that 'The National Heritage List for England is the official database of all nationally designated heritage assets – see [www.HistoricEngland.org.uk/listing/the-list](http://www.HistoricEngland.org.uk/listing/the-list). Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application. Archaeological potential should not be overlooked simply because it is not readily apparent'.
- 3.40 At paragraph 6, it is stated that 'Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice, and then to engage in pre-application discussion with the local planning authority and their heritage advisers to ensure that any issues can be identified and appropriately addressed'. It goes on to set out several stages that indicate the order in which this process can be approached, although the reader is advised that while it is good practice to check individual stages 'they may not be appropriate in all cases and the level of detail applied should be proportionate'. It gives the following example: