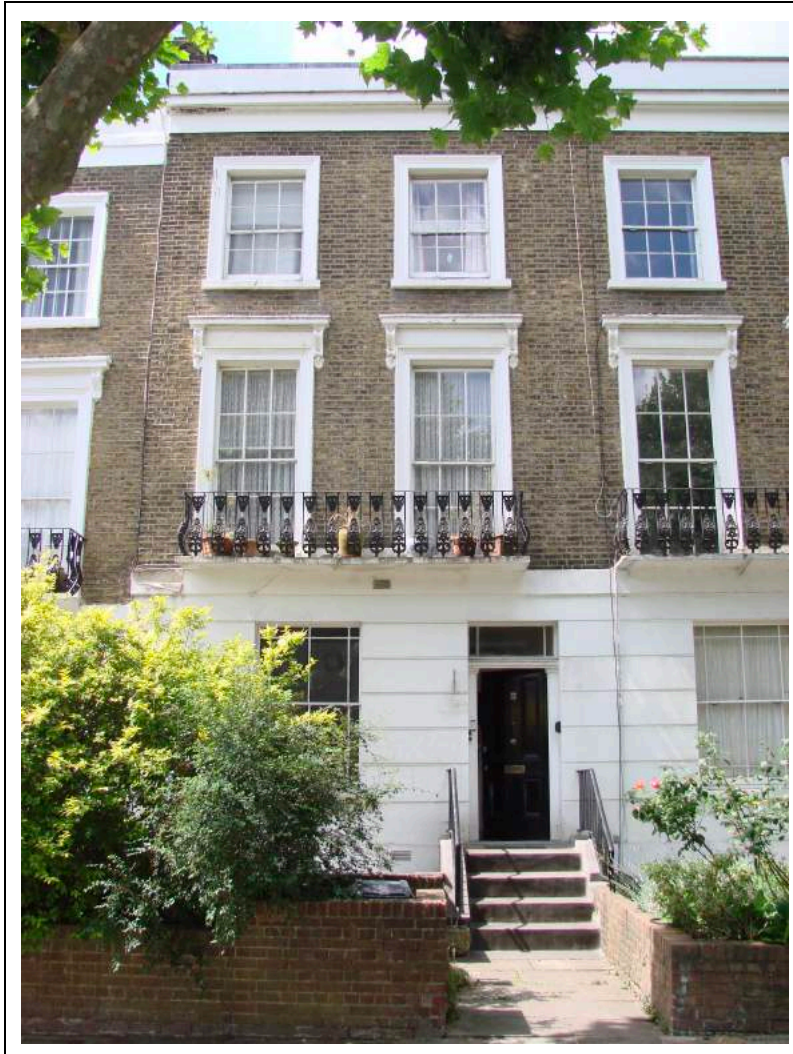


# STUDIO ASTRAGAL

**HERITAGE IMPACT ASSESSMENT  
OF PROPOSED INTERNAL AND EXTERNAL ALTERATIONS  
57B ALBERT STREET, LONDON, NW1 7LX**



**For  
Mr David Halpern  
October 2023  
Rev 1**

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## 1. Introduction

- 1.1 The building is Grade II Listed and is situated in the Camden Town Conservation Area in the London Borough of Camden. An assessment of the building's heritage significance has been carried out and a Statement of Heritage Significance produced by Studio Astragal Ltd, which should be referred to. Being a Grade II Listed Building, No. 57 Albert Street is *de facto* of national importance, although of less importance than a Grade II\* or Grade I Listed Building, and overall, its heritage significance is "High" on the ICOMOS scale.
- 1.2 However, not all parts of the building are of equal significance. The building's heritage significance resides primarily in the architectural design of its front façade, its surviving original fabric and architectural features and in its surviving original internal plan form and room proportions. The social history element of the building's heritage significance includes it being an example of middle-class urban housing typical of the expansion of London during the early 19<sup>th</sup> C. The building also makes an important contribution to the character of the Camden Town Conservation Area.
- 1.3 The proposal is for internal and external alterations as set out in drawings of the building as-existing and as proposed Nos. 400-DWG-000, 400-DWG-000, 400-DWG-001, 400-DWG-002, 400-DWG-003-A1, 400-DWG-050, 400-DWG-051, 400-DWG-052, 400-DWG-100-A10, 400-DWG-101-A7, and 400-DWG-102-A5.

## 2. The Brief

- 2.1 The brief is to provide a heritage impact assessment of the proposals as required by national and local planning regulations.
- 2.2 The purpose of this report is to assess the impacts of the proposals on the building's heritage significance and consider whether the proposals conform to national and local heritage conservation policies and advise on amendments and mitigations where appropriate.
- 2.3 Section 5.9 of British Standard BS7913:2013 – Guide to the Conservation of Historic Buildings states:-

*"The purpose of heritage impact assessments (HIAs) is to gain an understanding of the effect of development and changes on the historic asset, and how the impact of change might be mitigated.*

*HIAs can be carried out at various levels of scale and complexity, from the effects of building works on a small structure to the effects of major development in a world heritage site.*

*HIAs should identify the significance of the element concerned on the relative scale of values, the nature of the proposed change, an assessment of whether the change needs to be mitigated and if so how this can be achieved. The mitigation measures should be justified on the basis of the heritage asset's significance."*

- 2.4 Other relevant national guidance is:
  - Historic England (2015) Good Practice Advice (GPA) note 2 Managing Significance in Decision Taking in the Historic Environment
  - Historic England (2015) Good Practice Advice (GPA) note 3 The Setting of Heritage Assets.
  - BS 7913:2013 – Guide to the Conservation of Historic Buildings, The British Standards Institution.
  - Principles of Cultural Heritage Impact Assessment in the UK, IHBC/ CifA / IEMA, July 2021.
  - Conservation Principles – Policies and Guidance for the Sustainable Management of the Historic Environment, Historic England.
- 2.5 Camden's Local Area Requirements for Planning Applications (2020 state:-  
***"Heritage Statement - Listed Building and Conservation Area Appraisals***

*You must provide a justification of the proposal in accordance with the criteria set out in the National Planning Policy Framework.*

*You must provide information about:*

- the significance of the heritage asset affected, including any contribution made by their setting*
- the principles of and justification for the proposed works*
- the impact of the proposal on the significance of a heritage asset, does it cause substantial harm or total loss of significance.*

*The information should explain:*

- the sources that you have considered*
- the expertise that you have consulted*
- the steps that have been taken to avoid or minimise any adverse impacts on the significance of the asset.*

*If the proposed works would cause substantial harm or total loss of significance, provide a method statement and justification in line with National Planning Policy Framework.*

*The type and amount of detail required will vary according to the particular circumstances of each application.*

*You can provide this information in the design and access statement, where one is required, as part of the explanation of the design concept.*

*If you are not required to submit a design and access statement then you should provide this information in a separate written statement."*

### **3. Review of The Relevant National and Local Planning and Conservation Policies and Guidance**

#### **National Policy and Guidance**

3.1 The principal relevant policy and codes of practice documents are:

- The National Planning Policy Framework July 2021 (NPPF), The Government.
- BS 7913:2013 – Guide to the Conservation of Historic Buildings, The British Standards Institution.
- Conservation Principles – Policies and Guidance for the Sustainable Management of the Historic Environment, Historic England.
- Making Changes to Historic Assets – Historic England Advice Note 2.

The relevant sections of the above documents are included in Appendix 2.

3.2 The following other Historic England documents are also relevant:-

- Constructive Conservation in Practice,
- Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historic and traditionally constructed buildings,
- Energy Conservation in Traditional Buildings,
- The Energy Efficiency and Historic Buildings series of pamphlets,
- Climate Change and the Historic Environment,
- Building Regulations and Historic Buildings.

This is not necessarily a complete list.

#### **Local Policies and Guidance**

3.3 The following documents apply:-

- The Camden Local Plan 2017
- Design CPG Jan 2012
- Home Improvements CPG Jan 2021
- Energy Efficiency Planning Guidance for Conservation Areas
- Camden Retrofitting Planning Guidance October 2013

The relevant sections of these documents also are included in Appendix 2.

#### 4. The Methodology

- 4.1 The evaluation methodology is based on the guidance in the British Standards Institute's Standard BS 7913:2013, section 5.6.5 and ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. This can be shown in a matrix as set out in Figure 2 of the British Standard and section 5-8 of the ICOMOS Guidance. Whilst this methodology was developed for assessing the impacts on historic buildings in historic area appraisals and World Heritage Sites, it is a viable method for assessing a nationally designated single building and its individual elements. The BS Standard does not differentiate between negative changes and positive changes, such as restoration or reinstatement of lost features. ICOMOS does differentiate between adverse and beneficial changes (ICOMOS section 5-8).
- 4.2 Calibration is a matter of both facts and professional judgement. BS 7913:2013 gives no guidance on this. ICOMOS does give guidance, although this is general and at a macro-level and is not detailed.
- 4.3 Heritage significance can range from "None/Negligible" for elements of little or no architectural, cultural or historic merit (e.g., modern alterations) to "Very High" in respect of World Heritage Sites (ICOMOS section 4-10 and Appendix 3A). The significance and value of 57B Albert Street and its separate elements as set out in a separate Statement of Heritage Significance produced by Studio Astragal Ltd, which should be referred to.
- 4.4 The magnitude of impact of the proposed changes has been assessed. BS 7913:2013 gives no guidance on this. ICOMOS gives some advice in section 5.7 and Appendix 3B of its guidance (See Appendix 1). This advises that the scale or severity of impacts or changes can be judged taking into account their direct and indirect effects and whether they are temporary or permanent, reversible or irreversible. These can be adverse or beneficial. The cumulative effect of separate impacts should also be considered (ICOMOS 5-7). "Negligible" impact could encompass repointing a building in exactly the same style and materials and "Major" impact would include demolition. The scale or severity of impact can be ranked without regard to the value of the asset as:
  - No change
  - Negligible change
  - Minor change
  - Moderate change
  - Major change
- 4.5 The significance of the effect of change - i.e. the overall impact - on an attribute is a function of the importance of the attribute and the scale of change (ICOMOS section 5-8). As change or impacts may be adverse or beneficial, there is a nine-point scale with "neutral" as its centre point:
  - Major beneficial
  - Moderate beneficial
  - Minor beneficial
  - Negligible beneficial
  - Neutral

- Negligible adverse
- Minor adverse
- Moderate adverse
- Major adverse.

It should be borne in mind that this scale is intended to encompass changes ranging from the malicious total destruction of a World Heritage Site such as a Roman temple complex to very minor alterations to unlisted historic buildings of no architectural or historic merit. A proposal that scores low in the context of the world's heritage can nevertheless be significant at the local level.

- 4.6 The proposals also have been assessed on their compliance with the policies and guidance on alterations and extensions to Listed Buildings set out in the above-mentioned documents as advised by ICOMOS (section 5-11). The relevant sections are included in Appendix 2.

#### SIGNIFICANCE OF IMPACT (EITHER ADVERSE OR BENEFICIAL)

##### Magnitude of Impact Plotted Against Heritage Value of Asset

VALUE OF ASSET	Very High	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
	High	Neutral	Slight	Slight/Moderate	Moderate/Large	Large/Very Large
	Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/Large
	Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
	Negligible/None	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight
		No Change	Negligible	Minor	Moderate	Major
MAGNITUDE OF IMPACT						

Source: BS 7913:2013 Figure 2 and ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties section 5-8.

- 4.7 Heritage impact assessment is an iterative process and the results “should be fed back into the design process for the development...”. (ICOMOS section 6-1). It should include where possible proposed methods to mitigate or offset the effects of a development proposal (ICOMOS Section 6-3).

#### 5. Review of the Proposals and Assessment of their Impact on the Heritage Significance of the Building, Taking into Account the Statement of Heritage Significance and National and Local Conservation Planning Policies

##### External Alterations to Rear Elevation

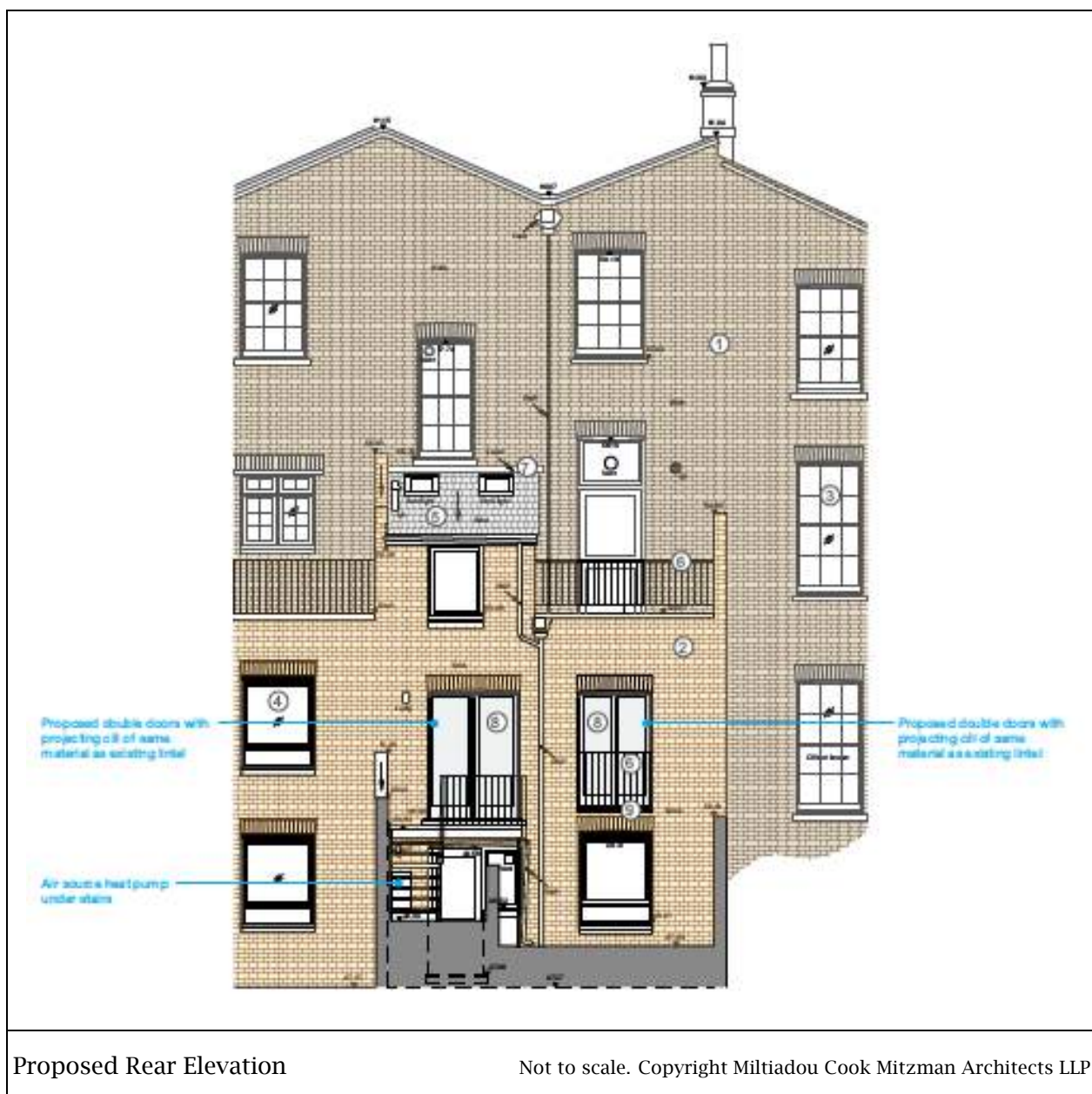
- 5.1 The proposals are to:

- install an air source heat pump on the garden wall below the rear metal staircase;
- remove the kitchen door and window and the masonry below the window and install pair of fully glazed French doors, with a projecting cill of reconstituted stone to match the existing lintels;
- remove the living room window and masonry below the window, lower the head of the opening to align with that of the kitchen doors and reconstruct the shallow



arched brick lintel, and install a pair of plain double-glazed French doors with a new projecting cill of reconstituted stone to match the existing lintels.

- iv) install a black painted metal balcony.



- 5.2 The heat pump would be tucked away in the corner of the garden under the existing metal staircase and mounted on the rendered garden wall. The alterations only affect the later modern rear extension and not any surviving original part of the original building. This modern approach matches the modern style of the extension, maintaining a cohesive façade. The parts of the building affected are of Low Heritage Significance. According to the ICOMOS assessment method, the works are considered to be “slight changes to historic building elements or setting that hardly affect it” and are defined as having “Negligible” magnitude of impact.

Proposal	Heritage Value	Magnitude of Impact	Effect on Significance of Building
Heat pump on garden wall	Low	Negligible	Neutral

Alterations to kitchen window and door	Low	Negligible	Neutral
Alterations to living room window	Low	Negligible	Neutral
New metal balcony	Low	Negligible	Neutral
<b>Cumulative</b>	<b>Low</b>	<b>Negligible</b>	<b>Neutral</b>

***Policy Compliance:***

5.3 The relevant policies are:

- i) NPPF Sections 201 - 202;
- ii) Conservation Principles - Policies and Guidance, Historic England, Sections 138 & 149;
- iii) Making Changes to Historic Assets - Historic England Advice Note, 2 Section 42;
- iv) BS 7913:2013 - Guide to the Conservation of Historic Buildings, BSI Standards Institution, Section 616;
- v) Camden Local Plan 2017 Policy D2;
- vi) Design CPG Sections 3.27 - 3.29 & 3.35 - 3.36;
- vii) Home Improvements CPG Jan 2021 Section 2.2.3;
- viii) Energy Efficiency Planning Guidance for Conservation Areas Section II.

***Mitigations:***

5.4 The following mitigations are advised:-

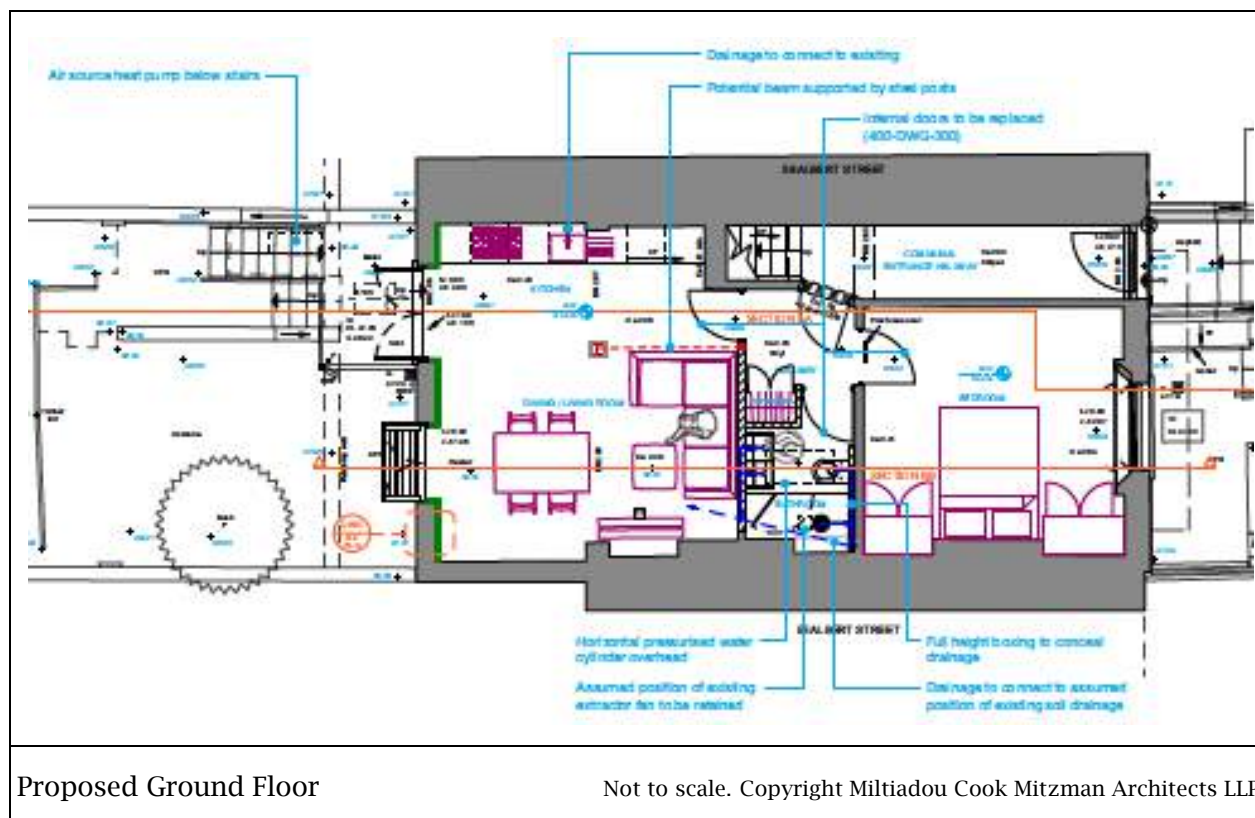
- i) The timber French doors should be painted white to match and their cills should be of a matching material to the existing cills, and the new balcony painted black to match. This can be controlled by a condition on the permissions.

**Internal Alterations to the Ground Floor**

5.5 The proposals are to:

- i) Demolish the modern partitioning between the bathroom and the living room and flat's entrance hall and strip out the existing bathroom.
- ii) Form new stud partition walls to the bathroom and entrance hall including formation of a coat cupboard and install new bathroom fittings and finishes.
- iii) Demolish a surviving section of historic stud partitioning and a section of modern stud partitioning between the living room and the kitchen and install a steel beam supported on steel posts.
- iii) Demolish a modern brick supporting pier and replace it with a steel column encased in plaster skimmed plasterboard. The structure above the demolished historic stud partition is to be supported by a horizontal downstand steel beam encased in plaster skimmed plasterboard supported on the new steel column at its rear end and a steel post concealed within the new stud partition wall.
- iv) The existing kitchen units, appliances and surface finishes will be stripped out and replaced with new ones.
- v) All the existing modern flush doors and their modern architraves will be replaced with new timber four-panelled doors with flat recessed panels and ogee bed mouldings and architraves to match the original front window's shutter panelling and architraves. Existing modern skirting boards will be replaced with ones that match originals elsewhere in the building. The new French doors at the rear will also have architraves to match the originals.





- 5.6 The proposals are relatively limited and involve only the rear part of the ground floor where the internal plan form and compartmentalisation has been radically altered and all its historic features and some of its original fabric have been removed. It has lost its historic character and is considered to be of Low Heritage Significance. The remaining significance lies in its surviving historic fabric.
- 5.7 The proposals do not involve the loss of historic features. The only loss of historic fabric is the removal of the remnant of historic stud partition wall between the kitchen and the living room. Only the timber studs are original. The original lathe and plaster have been replaced with modern plasterboard with a plaster skim. This wall originally separated the rear room from the staircase compartment. It appears to support at least the staircase half-landing between the ground and first floors and the ends of the flights of stairs that rest on it. To maintain support, a horizontal steel is proposed, supported on the proposed new steel column and a steel post encased within the new stud wall of the bathroom. The details of this structural supporting work will be the subject of a structural engineer's assessment and report at the Building Regulation stage.
- 5.8 The new partitioning rationalises the spaces in the rear part of the building and the new kitchen and bathroom connect to existing services and do not cause any new impacts on the building.
- 5.9 According to the ICOMOS assessment method the alterations are considered to be "slight changes to historic building elements or setting that hardly affect it" and are defined as having "Negligible" magnitude of impact.

Proposal	Heritage Value	Magnitude of Impact	Effect on Significance of Building
Demolition of modern partition walls and construction of new partition walls	None	Negligible	Neutral
Demolition of brick pier and replacement with a steel post encased in plasterboard	None	Negligible	Neutral

Stripping out and replacement of bathroom	None	Negligible	Neutral
Stripping out and replacement of kitchen	None	Negligible	Neutral
Demolition of remnant of original stud wall	Low	Minor Adverse	Slight Adverse
Insertion of horizontal steel beam and steel post encased in new stud wall	Low	Negligible	Neutral
Internal insulation of rear wall	Low	None	Neutral
Replacement of doors, architraves and skirting boards to match originals	Low	Minor Beneficial	Slight Beneficial
<b>Cumulative</b>	<b>Low</b>	<b>Negligible</b>	<b>Neutral</b>

***Policy Compliance:***

5.10 The following policies apply:

- i) NPPF Sections 201 - 202;
- ii) Conservation Principles - Policies and Guidance, Historic England Section 138 - Section 149;
- iii) Making Changes to Historic Assets - Historic England Advice Note 2, Sections 42, 45, 48 & v52;
- iv) BS 7913:2013 - Guide to the Conservation of Historic Buildings, BSI Standards Institution Section 6.16 minimises impact avoiding loss of features Section 6.17 reinstatement;
- v) Camden Local Plan Policies D1 & Policy D2;
- vi) Design CPG Jan 2021 Sections 3.27 - 3.29 & 3.35 - 3.36.

***Mitigations:***

5.11 The following mitigations are advised:-

- ii) All new timber joinery should be painted.

## 6. Conclusions

### Cumulative Impact

Proposal	Heritage Value	Magnitude of Impact	Effect on Significance of Building
External Alterations at Rear	Low	Negligible	Neutral
Internal Alterations to Ground Floor	Low	Negligible	Neutral
<b>Cumulative</b>	<b>Low</b>	<b>Negligible</b>	<b>Neutral</b>

- 6.1 Cumulatively, when judged using the ICOMOS / BS 7913:2013 Heritage Impact Assessment methodology the magnitude of the scheme's changes is considered to be "Negligible, i.e., involving "slight changes to historic building elements or setting that hardly affect it". Because the overall heritage significance of the parts of the building is "Low", this results in a score of a "Neutral" effect on the significance of the building.
- 6.2 The ICOMOS / BS 7913:2013 methodology tends to understate the impacts of small alterations to Listed Buildings, when placed in an international context of World Heritage Sites at the top end and buildings of no heritage value at the bottom end. The impacts may be considered to be of more importance in a local context of the building.

- 6.3 It is considered that the proposals are generally in conformity with national and local heritage conservation policies. Whilst there is a presumption against the loss of historic fabric, the loss is relatively small, and the spaces affected have lost their historic character and are of Low Heritage Significance.
- 6.4 The Slight Adverse impact of the removal of the short section of original studwork, would fall within the category of “less than substantial harm” referred to in Section 202 of the NPPF, which may be weighed against the public benefits of the proposals, but is not considered to be significant. The replacement of the doors, architraves and skirting boards with more appropriate ones to match the originals is considered sufficient compensation in mitigation.

27.10.2023

## APPENDIX 1 GUIDANCE ON HERITAGE IMPACT ASSESSMENTS FOR CULTURAL WORLD HERITAGE PROPERTIES

A publication of the International Council on Monuments and Sites

January 2011

### Appendix 3A: Example Guide for Assessing Value of Heritage Assets

HIAs for WH properties will need to consider their international heritage value and also other local or national values, and priorities or recommendations set out in national research agendas. They may also need to consider other international values which are reflected in, for example, international natural heritage designations.

Professional judgement (sic) is used to determine the importance of the resource. The value of the asset may be defined using the following grading scale:

- Very High
- High
- Medium
- Low
- Negligible
- Unknown potential.

The following table is not intended to be exhaustive.

Grading	Archaeology	Built heritage or Historic Urban Landscape	Historic landscape	Intangible Cultural Heritage or Associations
<b>Very High</b>	<p>Sites of acknowledged international importance inscribed as WH property.</p> <p>Individual attributes that convey OUV of the WH property.</p> <p>Assets that can contribute significantly to acknowledged international research objectives.</p>	<p>Sites or structures of acknowledged international importance inscribed as of universal importance as WH property.</p> <p>Individual attributes that convey OUV of the WH property.</p> <p>Other buildings or urban landscapes of recognised international importance.</p>	<p>Landscapes of acknowledged international importance inscribed as WH property.</p> <p>Individual attributes that convey OUV of the WH property.</p> <p>Historic landscapes of international value, whether designated or not.</p> <p>Extremely well preserved historic landscapes with exceptional coherence, timed depth, or other critical factors.</p>	<p>Areas associated with Intangible Cultural heritage activities as evidenced by the national register.</p> <p>Associations with particular innovations, technical or scientific developments or movements of global significance.</p> <p>Associations with particular individuals of global importance</p>
<b>High</b>	Nationally-designated Archaeological Monuments protected by the State Party's laws	Nationally-designated structures with standing remains.	Nationally designated historic landscape of outstanding interest.	Nationally designated areas or activities associated with globally important

	<p>Undesignated sites of the quality and importance to be designated.</p> <p>Assets that can contribute significantly to acknowledged national research objectives.</p>	<p>Other buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade.</p> <p>Conservation Areas containing very important buildings.</p> <p>Undesignated structures of clear national importance.</p>	<p>Undesignated landscapes of outstanding interest.</p> <p>Undesignated landscapes of high quality and importance, and of demonstrable national value.</p> <p>Well preserved historic landscapes, exhibiting considerable coherence, time depth or other critical factors.</p>	<p>Intangible Cultural Heritage activities.</p> <p>Associations with particular innovations, technical or scientific developments or movements of national significance</p> <p>Associations with particular individuals of national importance</p>
<b>Medium</b>	<p>Designated or undesignated assets that can contribute significantly to regional research objectives</p>	<p>Designated buildings.</p> <p>Historic (unlisted) buildings that can be shown to have exceptional qualities or historical associations.</p> <p>Conservation Areas containing buildings that contribute significantly to its historic character.</p> <p>Historic townscapes or built-up areas with important historic integrity in their buildings, or built settings.</p>	<p>Designated special historic landscapes.</p> <p>Undesignated historic landscapes that would justify special historic landscape designation.</p> <p>Landscapes of regional value.</p> <p>Averagely well preserved historic landscapes with reasonable coherence, time depth or other critical factors.</p>	<p>Areas associated with Intangible Cultural heritage activities as evidenced by local registers.</p> <p>Associations with particular innovations or developments of regional or local significance.</p> <p>Associations with particular individuals of regional importance</p>
<b>Low</b>	<p>Designated or undesignated assets of local importance.</p> <p>Assets compromised by poor preservation and/or poor survival of</p>	<p>“Locally Listed” buildings.</p> <p>Historic (unlisted) buildings of modest quality in their fabric or historical associations.</p>	<p>Robust undesignated historic landscapes.</p> <p>Historic landscapes with importance to local interest groups.</p>	<p>Intangible Cultural heritage activities of local significance</p> <p>Associations with particular individuals of local importance</p>

	contextual associations.  Assets of limited value, but with potential to contribute to local research objectives.	Historic Townscape or built-up areas of limited historic integrity in their buildings, or built settings.	Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.	Poor survival of physical areas in which activities occur or are associated
<b>Negligible</b>	Assets with little or no surviving archaeological interest.	Buildings or urban landscapes of no architectural or historical merit;  buildings of an intrusive character.	Landscapes little or no significant historical interest.	Few associations or ICH vestiges surviving
<b>Unknown potential</b>	The importance of the asset has not been ascertained.	Buildings with some hidden (i.e. inaccessible) potential for historic significance.	n/a	Little is known or recorded about ICH of the area

#### Appendix 3B: Example Guide for assessing magnitude of impact

<b>Impact Grading</b>	<b>Archaeological attributes</b>	<b>Built heritage or Historic Urban Landscape</b>	<b>Historic landscape attributes</b>	<b>Intangible Cultural Heritage attributes or Associations</b>
<b>Major</b>	Changes to attributes that convey OUV of WH properties  Most or all key archaeological materials, including those that contribute to OUV such that the resource is totally altered.	Change to key historic building elements that contribute to OUV, such that the resource is totally altered. Comprehensive changes to the setting.	Change to most or all key historic landscape elements, parcels or components; extreme visual effects; gross change of noise or change to sound quality; fundamental changes to use or access; resulting in total change to historic landscape character unit and loss of OUV.	Major changes to area that affect the ICH activities or associations or visual links and cultural appreciation.
<b>Moderate</b>	Changes to many key archaeological materials, such that the resource is clearly	Changes to many key historic building elements, such that the resource is	Change to many key historic landscape elements, parcels or	Considerable changes to area that affect the ICH activities or associations or

	<p>modified.</p> <p>Considerable changes to setting that affect the character of the asset.</p>	<p>significantly modified.</p> <p>Changes to the setting of an historic building, such that it is significantly modified</p>	<p>components; visual change to many key aspects of the historic landscape; noticeable differences in noise or sound quality; considerable changes to use or access; resulting in moderate changes to historic landscape character.</p>	<p>visual links and cultural appreciation.</p>
<b>Minor</b>	<p>Changes to key archaeological materials, such that the resource is slightly altered.</p> <p>Slight changes to setting.</p>	<p>Change to key historic building elements, such that the asset is slightly different.</p> <p>Change to setting of an historic building, such that it is noticeably changed.</p>	<p>Change to few key historic landscape elements, parcels or components; slight visual changes to few key aspects of historic landscape; limited changes to noise levels or sound quality; slight changes to use or access; resulting in limited change to historic landscape character.</p>	<p>Changes to area that affect the ICH activities or associations or visual links and cultural appreciation.</p>
<b>Negligible</b>	<p>Very minor changes to key archaeological materials, or setting.</p>	<p>Slight changes to historic building elements or setting that hardly affect it.</p>	<p>Very minor changes to key historic landscape elements, parcels or components; virtually unchanged visual effects; very slight changes in noise levels or sound quality; very slight changes to use or access; resulting in a very small change to</p>	<p>Very minor changes to area that affect the ICH activities or associations or visual links and cultural appreciation.</p>



			historic landscape character.	
<b>No change</b>	No change.	No change to fabric or setting.	No change to elements, parcels or components; no visual or audible changes; no changes in amenity or community factors.	No change

Note: OUV = Outstanding Universal Value.

## APPENDIX 2 KEY RELEVANT CONSERVATION AND DESIGN POLICIES

### National Policy and Guidance

#### The National Planning Policy Framework July 2021

This does not give detailed conservation or design advice. Section. 127 of Chapter 12 sets out general principles for new developments:-

#### 16. Conserving and enhancing the historic environment

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value<sup>66</sup>. These assets are an irreplaceable resource, and 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<sup>67</sup>.
197. In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness.

.....

#### Considering potential impacts

199. 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.
200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional<sup>68</sup>.
201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
  - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
  - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

## **Conservation Principles – Policies and Guidance, Historic England**

This does not give any specific detailed guidance about alterations to listed buildings. Its general principle states:-

### **“New work and alteration**

138 New work or alteration to a significant place should normally be acceptable if:

- a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;
- c. the proposals aspire to a quality of design and execution which may be valued now and in the future;
- d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.”

....

### **Integrating conservation with other public interests**

149 Changes which would harm the heritage values of a significant place should be unacceptable unless:

- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;
- b. there is no reasonably practicable alternative means of doing so without harm;
- c. that harm has been reduced to the minimum consistent with achieving the objective;
- d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering
  - its comparative significance,
  - the impact on that significance, and
  - the benefits to the place itself and/or the wider community or society as a whole.

## **Making Changes to Historic Assets – Historic England Advice Note 2**

The following extracts are particularly relevant:

### **3 Addition and Alteration**

#### **General Points**

- 41 The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting. Replicating a particular style may be less important, though there are circumstances when it may be appropriate. It would not normally be good practice for new work to dominate the original asset or its setting in either scale, material or as a result of its siting. Assessment of an asset's significance and its relationship to its setting will usually suggest the forms of extension that might be appropriate.
- 42 The historic fabric will always be an important part of the asset's significance, though in circumstances where it has clearly failed it will need to be repaired or replaced; for instance, seaside piers, constructed in timber and iron in a very hostile environment, will only survive through replication of corroded elements and mass-produced components in some C20 buildings, such as steel-framed windows, may not be simple to repair and repair would therefore be disproportionate. In normal circumstances, however, retention of as

much historic fabric as possible, together with the use of appropriate materials and methods of repair, is likely to fulfil the NPPF policy to conserve heritage assets in a manner appropriate to their significance, as a fundamental part of any good alteration or conversion. It is not appropriate to sacrifice old work simply to accommodate the new.

- 43 The junction between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting. Where possible it is preferable for new work to be reversible, so that changes can be undone without harm to historic fabric. However, reversibility alone does not justify alteration; if alteration is justified on other grounds, then reversible alteration is preferable to non-reversible. New openings need to be considered in the context of the architectural and historic significance of that part of the asset and of the asset as a whole. Where new work or additions make elements with significance redundant, such as doors or decorative features, there is likely to be less impact on the asset's aesthetic, historic or evidential value if they are left in place.

## **Buildings and Structures**

....

- 45 The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.

.....

- 48 The insertion of new elements such as doors and windows, (including dormers and roof lights to bring roof spaces into more intensive use) is quite likely to adversely affect the building's significance. Harm might be avoided if roof lights are located on less prominent roof slopes. New elements may be more acceptable if account is taken of the character of the building, the roofline and significant fabric. Roof lights may be more appropriate in agricultural and industrial buildings than dormers. In some circumstances the unbroken line of a roof may be an important contributor to its significance.
- 49 New features added to a building are less likely to have an impact on the significance if they follow the character of the building. Thus in a barn conversion new doors and windows are more likely to be acceptable if they are agricultural rather than domestic in character, with the relationship of new glazing to the wall plane reflecting that of the existing and, where large door openings are to be glazed, with the former doors retained or replicated so that they can be closed.
- 50 Small-scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs, will frequently contribute strongly to a building's significance and removing or obscuring them is likely to affect the asset's significance.
- 51 Historic flooring materials will often be of interest in themselves. Additional care is needed on lower floors to ensure that archaeological interest below the finished surface is not adversely affected by proposed works.
- 52 Although some works of up-grading, such as new kitchens and bathroom units, are unlikely to need consent, new services, both internal and external, can have a considerable, and often cumulative, impact on the significance of a building and can affect significance if added thoughtlessly. The impact of necessary services can be minimised by avoiding damage to decorative features, by carefully routeing (sic) and finishing and by use of materials appropriate to the relevant period, such as cast iron for gutters and down-pipes for many Georgian and Victorian buildings. Certificates of Lawful Proposed Works, Local Listed Building Consent Orders and Listed Building Heritage Partnership Agreements may all be useful mechanisms to clarify where the limits of permissibility exist in individual cases. ...

### **6.15 Adaption, conversion and extension**

... New extensions should normally be subservient to the historic building in terms of scale, height and massing.

... New works should not obliterate or destroy features of interest in the historic building. It might be necessary for extensions to be attached by a smaller link section rather than directly to the original building.

### **6.16 Alterations**

Alterations should be carried out only if there is no suitable alternative option. They should be designed to minimise their impact on the significance of the historic building, and should avoid losing features that contribute to that significance.

The principle of reversibility should be used, ....

### **6.17 Reinstatement**

Where a historic building has been altered in the past and is being reinstated to its original form, elements of the historic building which contribute to its original design might have been lost and their replacement might be justified, for example, the loss of some pinnacles, sections of balustrades and sash windows. Several factors should be taken into account. These include:

- a) whether there is evidence of the original design;
- b) the quality of the alterations relative to the significance of the original design;
- c) the magnitude of the impact of alterations on significance;
- d) retaining alterations as evidence of the historic building's history;
- e) whether reinstatement would make the historic building more fit for purpose; and
- f) archaeological interest/evidential value of a historic building's development that might be lost.

Reinstatement should be based on strong evidence and research. Where there is insufficient evidence of the original design, conjectural reinstatement should be avoided.

## **Local Policy and Guidance**

### **LB Camden Relevant Design and Conservation Policies**

#### **Camden Local Plan June 2017**

#### **Design**

- 7.1 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

..

#### **Policy D1 Design**

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;

- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;

....

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

....

### **Excellence in design**

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

...

### **Details and materials**

- 7.9 Architectural detailing should be carefully integrated into a building. In new development, detailing should be carefully considered so that it conveys quality of design and creates an attractive and interesting building. Architectural features on existing buildings should be retained wherever possible, as their loss can harm the appearance of a building by eroding its detailing. The insensitive replacement of windows and doors can spoil the appearance of buildings and can be particularly damaging if the building forms part of a uniform group.
- 7.10 Schemes should incorporate materials of a high quality. The durability and visual attractiveness of materials will be carefully considered along with their texture, colour, tone and compatibility with existing materials. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings, or, where appropriate, in materials that complement or enhance a building or area.

....

### **Policy D2 Heritage**

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

#### **Designated heritage assets**

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

...

## **Supplementary Planning Guidance**

### **Design CPG Jan 2021**

#### **Alterations to Listed Buildings**

- 3.27 In assessing applications for listed building consent the Council has a statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. We will consider the impact of proposals on the historic significance of the building, including its features, such as:
- original and historic materials and architectural features;
  - original layout of rooms;
  - structural integrity; and
  - character and appearance.
- 3.28 We will expect original or historic features to be retained and repairs to be in matching material. Proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them.
- 3.29 Applications for listed building consent should be fully justified and should demonstrate how proposals would affect the significance of a listed building and why the works or changes are desirable or necessary. In addition to listed building consent, some proposals may also require planning permission. These applications should be submitted together and will be assessed concurrently.

#### **Preventing harm to heritage assets**

- 3.35 In accordance with Camden Local Plan policy H2 and the National Planning Policy Framework (NPPF) the Council will not permit the loss of or substantial harm to a designated heritage asset 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 particular circumstances apply.
- 3.36 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 outweigh that harm.

## **Home Improvements CPG Jan 2021**

### **2.2.3 BALCONIES AND TERRACES**

Balconies can provide valuable amenity space, especially for flats that would otherwise have little or no private exterior space. When considering a balcony for your property, it is important you appreciate the impact of this alteration on the roof form, host building, wider area and neighbouring amenity.

Depending on their size, balconies could generate harmful noise disturbance to your neighbours when in use. The intensity of the use of a balcony depends on the size and number of people they could accommodate at one time. A modest balcony is more likely to receive consent than larger ones.



There are certain considerations that should be taken into account when designing a balcony, to ensure it is sensitively and appropriately designed for its context. A new balcony should:

.....

- Carefully consider materials for enclosure:
  - For traditional buildings, metal railings are preferred as they integrate well with the building's character, are more resilient, require low maintenance, support plants growth;

....

- Be located at the rear of properties to ensure no impact on the streetscene and wider area;

## **Energy Efficiency Planning Guidance for Conservation Areas**

...

### **ii) Windows**

Retaining the features and appearance of the original window is important to preserving a conservation area's special character and appearance. If your windows are original to the building (or match in appearance and are the same material as the original windows), they will contribute to the character of the area and efforts should be made to retain them where possible. Historic timber windows are also typically made of high quality wood and can have an indefinite lifespan if they are regularly maintained.

...

Replacing an existing window with a new double glazed window of a different material or appearance requires planning permission.

Where timber is the original material and the use of alternative materials is proposed as part of a planning application, the application is unlikely to be acceptable. This is to ensure that new windows are in character with the traditional window type of the area – and that the area's character is preserved.

.....

If you live in a flat or maisonette, planning permission is required for replacement windows, to ensure the character and appearance of the building as a whole is not lost as a result of unsympathetic changes. To achieve appropriate glazing bar widths, slim-line double glazed units may need to be specified. Double glazed units are now manufactured to very slim proportions (up to 9mm depth) in order to replicate historic window types and details such as narrow glazing bars.

## **Camden Retrofitting Planning Guidance October 2013**

This does not give any specific guidance relevant to this proposal.