

13 Grafton Crescent
November 2023



HERITAGE IMPACT ASSESSMENT
13 GRAFTON CRESCENT, LONDON

Quality Assurance

Site name:	13 Grafton Crescent London NW1 8SL
Client name:	Alexis Zegerman and Peter Graff
Type of report:	Heritage Impact Assessment
Prepared by:	Sarah Wearing BA(Hons)
Date	26 th October 2023
Reviewed by:	Katherine Harrison MSt, BA(Hons), IHBC
Date	14 th November 2023



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1.0 Introduction

- 1.1 This Impact Assessment has been produced by Bidwells on behalf of Alexis Zegerman and Peter Graff to support the erection of a mansard roof extension at 13 Grafton Crescent, London, hereafter called ‘the site’.
- 1.2 The site is located on the western side of Grafton Crescent. There are no listed buildings located within the site, however, No. 13 has been identified as a ‘Locally Listed’ Building by Camden Council, so is considered to be a Non-Designated Heritage Asset. It is not within a conservation area, however, the north-west corner of the Kelly Street Conservation Area is approximately 26m north-east of the site.
- 1.3 This Impact Addendum should be read in conjunction with the Heritage Statement produced by Janus Conservation dated March 2023 and authored by Katherine Harrison, now Principal Heritage Consultant at Bidwells. Within the Janus Conservation Heritage Statement, the building was found to be of a **neutral-low** level of significance in heritage terms with much of this significance resting primarily in the building’s front elevation and its contribution to the ‘symmetrical’ character of the terrace.



Figure 1: Aerial showing the location of the site, the boundary is marked in red (Google Maps)

- 1.4 This Impact Assessment considers the potential impact of the proposed development on the significance of the heritage assets identified, including the contribution made by setting. This approach to impact-assessment is required in order to satisfy the provisions of Section 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on a heritage asset is being considered (Paragraphs 193-206).

Authorship

- 1.5 This document has been prepared by Sarah Wearing BA(Hons), Assistant Heritage Consultant, and reviewed by Katherine Harrison, Principal Heritage Consultant, MSt, BA(Hons), IHBC.

2.0 The Proposals

2.1 The proposals seek to erect a mansard roof extension to No. 13 Grafton Crescent. The extension has been set back and has been designed to be subservient. It will not be visible from the wider streetscape. The client has also proposed to retain the valley roof detail at the rear of the building to allow this morphology to remain legible.



Figure 2: Existing (top) and Proposed Front elevation of No. 13 Grafton Crescent



Figure 3: Existing (top) and Proposed rear elevation of No. 13 Grafton Crescent

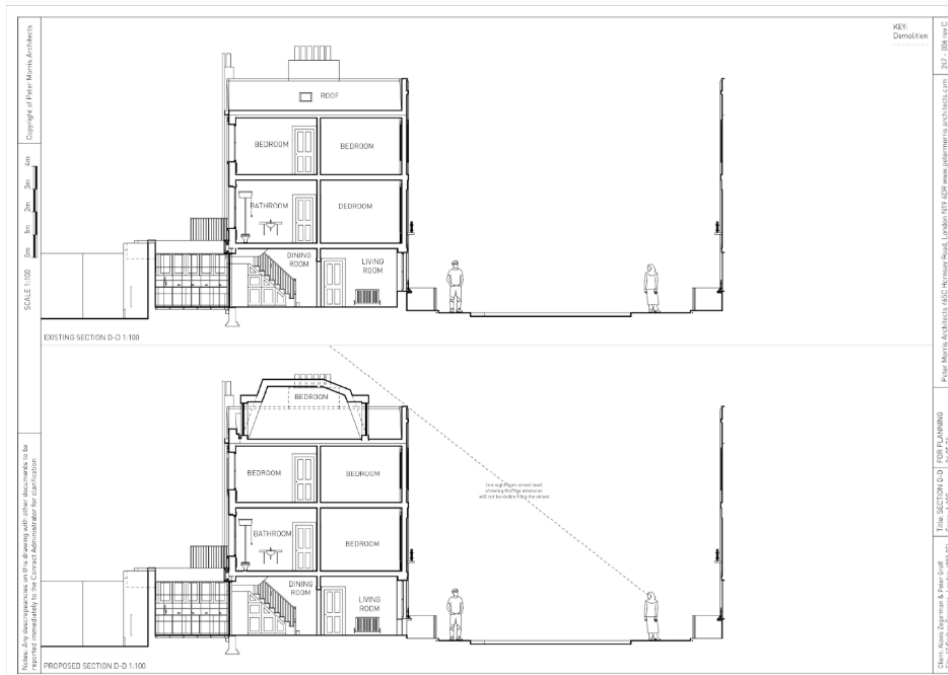


Figure 4: Existing (top) and Proposed section drawing of No. 13 Grafton Crescent.

3.0 Verified Views

- 3.1 In a previous pre-application, the conservation officer pinpointed three viewpoints that could be altered by introducing a mansard roof extension. The clients have invested in verified views by Ocean CGI to showcase that the roofscape of No.13 Grafton Crescent, both as it is currently and as it will be after the proposed development, will not be visible from the larger streetscape. The verified views below were undertaken by Ocean CGI in 2023.



Figure 5: Aerial view of Grafton Crescent. Site highlighted in red. Viewpoints identified by Conservation Officer annotated as red dots.

View 1



Figure 6: View 1 - Existing roovescape.



Figure 7: View 1 - Proposed roovescape outlined in blue.

View Two



Figure 8: View 2 - Existing roovescape.



Figure 9: View 2 - Proposed roovescape outlined in blue. As you can see the proposal will not be visible from the streetscape due to the design and topography of the road.

View 3



Figure 10 View 3 - Existing roofscape.

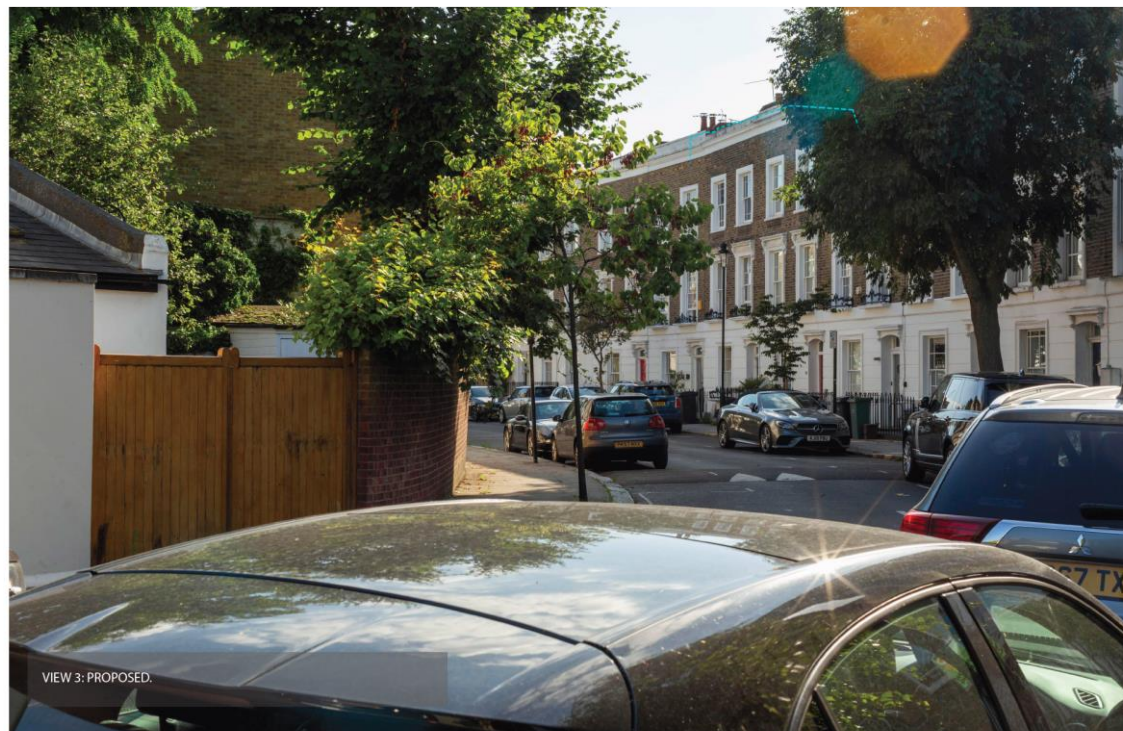


Figure 11: View 3 - Proposed roofscape outlined in blue. As you can see the proposal will not be visible from the streetscape due to the design and topography of the road.

4.0 Impact Assessment

- 4.1 In order to assess the suitability of the site for the proposed development, it is necessary to determine the *nature* and *extent* of any impacts resulting from the proposal on heritage assets and/or their settings.
- 4.2 When assessing the impact of a proposed development on individual or groups of heritage assets, it is important to assess both the potential, direct physical impacts of the development scheme as well as the potential impacts on their settings and where effects on setting would result in harm to the significance of the asset. It is equally important to identify benefits to settings, where they result from proposals.
- 4.3 The proposed development is considered below in terms of its impact on the significance of the heritage assets, and the contribution which setting makes to their significance. Assessment of impact levels are made with reference to Table 2 in Section 3 and satisfy ‘**Step 3**’ of Historic England’s GPA 3

13 Grafton Crescent – Locally Listed Building



Figure 12: No. 13 Grafton Crescent identified by the yellow arrow.

- 4.4 In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset. As stated in Janus Conservation’s Heritage Statement, No. 13 Grafton Crescent is considered to hold a **neutral-low** level of significance with much of this significance resting primarily in the building’s front elevation and its contribution to the ‘symmetrical’ character of the terrace.
- 4.5 No.13 is located to the southern end of the western Grafton Crescent terrace. It currently has a valley roof, which would have been the historic form of the roof, hidden behind a parapet at the

front of the building, with only parts of the chimney pots visible from the street. The property, along with the rest of the terrace, was significantly bomb damaged in World War II, to the extent that it was marked as being of 'doubtful repairability'. Therefore, a significant proportion of the building is likely not original, being largely rebuilt in the mid-20th century.

4.6 The proposed mansard roof extension has been carefully designed to be lower than the chimney pots of the property and is stepped back from the front of the building, to ensure it is not visible from the street and would be an appreciably subservient addition to the building. The current valley roof will be retained to allow the historic roofline to still be read from the rear of the property.

4.7 In addition, there are a number of other examples of mansard-style roof extensions that exist in the immediate area, both within terrace to which the site belongs (nos 14 and 15 Grafton Crescent) as well as in the wider terraced street scene such as at nos 13 and 21 Healey Street, views of which can be gained from Grafton Crescent. As noted in the Design and Access Statement there are properties in the wider context which have roof extensions that have broken the original roof. In our assessment they have no significant impact upon the character or appearance of the original dwelling or the wider street scene. It is recognised that there is a potential for harm from insensitive roof alterations and the need to guard against them, however the proposals within this application have been designed in a careful and sensitive manner to not detract from the host building or surrounding context.



Figure 13: No. 13 Grafton Crescent identified in yellow.

4.8 The proposal would be recessed behind the dwelling's front elevation with the parapet wall retained intact, in line with the guidance provided in the Camden Planning Guidance Design CPG1. The shallow pitch of the front roof slope would ensure that the roof addition would be out of sight from street level along the Crescent. Longer distance views may reveal its presence to a degree, but in our professional opinion, and as demonstrated by the verified views in section 3 of this report, it would not be openly detected or seen as an incongruous addition. The butterfly roof profile would be retained to the rear, in accordance with Camden Council guidance. Overall, it is considered that the proposal would have no detrimental impact upon the character or appearance of No 13, the terrace, or the wider street scene.

4.9 When considering the impact of the proposal on 13 Grafton Crescent, the addition of a well-designed and high-quality mansard roof extension to the building, which is considered the most appropriate form of roof extension for a Georgian or Victorian building, and would not be visible from the streetscape, is considered overall to have a **neutral impact** to the significance of No. 13 Grafton Crescent. The proposed roof extension will allow for the property to introduce sustainability measures currently not possible with the existing roof form. Furthermore, the main significance of the terrace- its uniform front elevation- will not be impacted physically or aesthetically by the proposals.

4.10 Therefore, the scheme is not considered to be in conflict with Paragraph 203 of the National Planning Policy Framework 2023.

7-13 (odd) and 16-26 (even) Grafton Crescent – Locally Listed Buildings



Figure 14: View of Grafton Crescent.

- 4.11 In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset. As stated in Janus Conservation’s Heritage Statement, the Grafton Crescent terraces are considered to hold a **low** level of significance with the application site making a **minor beneficial** contribution as part of the terrace on the western side of the road.
- 4.12 As noted in the Janus Conservation Heritage Statement, not every property within the two Grafton Crescent terraces is considered as a Non-Designated Heritage Asset, as Nos. 8, 10, 12, 14 and 15 have been excluded from the designation in the western terrace, and Nos. 17, 19, 21, 23, 25 and 27 excluded from the eastern terrace.
- 4.13 Although the two terraces look superficially uniform at first appearance due to their similar materiality, the detailing across the two is an amalgamation of repairs and replacements. The fenestration on the first and second floors of the eastern terrace have many different types of detailing, with a mixture of moulded architraves, horned and non-horned sashes and some iron railings. The mouldings on the ground floor around the front doors also vary in size and depth. The corncicing at the top of the terrace is the most visible lack of uniformity, with varying depths and profiles of moulding resulting in varying heights to the parapet across the terrace.
- 4.14 The western terrace also has a variety of different fenestration detailing and door detailing. Unlike the eastern terrace, the western terrace has had its parapet rebuilt in brick, with no cornice detail, although even this has differing heights across the terrace. Rather than the smooth curve found in the eastern terrace, the western terrace has a central six-bay projecting block of three properties (Nos. 21-23) with the flanking six-bays sat further back (Nos. 24-26 and 20-18), then a final five bays to the south (Nos. 16-17) sat back even further.
- 4.15 This lack of uniformity is due to the extensive bomb damage both terraces suffered during World War II. Nos. 1-6 originally part of the terrace to the north were completely destroyed (and later

rebuilt separately to the terrace) and the rest of the two terraces were seriously damaged, with many marked on the bomb map as ‘of doubtful repairability’ due to the extensive destruction. Therefore, the terraces are not the ‘well-preserved mid-19th century’ properties as described in the Local List.



Figure 15: View of Grafton Crescent- No. 13 identified in yellow.

4.16 Due to this extensive mid-20th century rebuilding, the rooflines of the terraces are not all uniform. Although most retain their historic valley roof form, the roofs of Nos. 14 and 15 have already been altered, changing the profile of their roofs. In that existing context, the addition of a mansard roof to No 13 would not appear unusual or draw disproportionate attention – as it will not be visible from the public streetscape.

4.17 When considering the impact of the proposal on the Grafton Crescent Terraces, the addition of a well-designed and high-quality mansard roof extension to No. 13, in a terrace that already has a variation in roofline and that would not be visible within the streetscape is considered overall to have a **neutral** impact on the significance of the Grafton Crescent Terraces. Therefore, the scheme is not considered to be in conflict with Paragraph 203 of the National Planning Policy Framework 2023.

Kelly Street Conservation Area

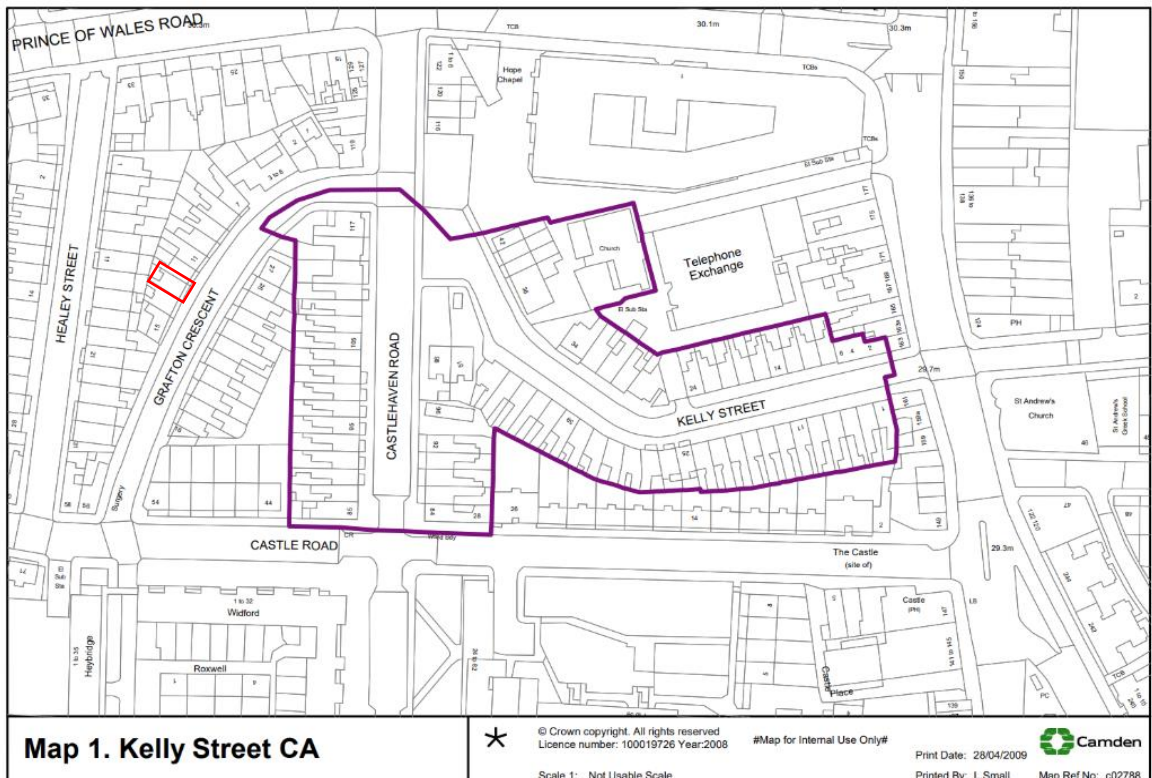


Figure 16: Kelly Street Conservation Area- site is identified in red.

- 4.18 The statutory duty under section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character and appearance of the Conservation Area. As stated in the accompanying Heritage Statement, the Kelly Street Conservation Area is considered to hold a **good** level of significance with the application site making a **minor beneficial** contribution to its setting as part of a Victorian terrace with a similar form to those found in Castlehaven Street.
- 4.19 The Kelly Street Conservation Area was first designated in July 1975, with further boundary extensions in 1980 and 1985. It mainly covers the adjacent roads of Castlehaven Road and Kelly Street to the east of the site. Therefore, the terrace containing the site looks into the Conservation Area and as such, views out from the conservation area must be considered. Interestingly, the backs of gardens of the houses on Castlehaven Road, which back on to Grafton Crescent, all have mansard roof extensions further supporting that an alteration such as the one being proposed within this application is in keeping with the local context.
- 4.20 When considering the impact of the proposal on the Kelly Road Conservation Area, the introduction of the mansard roof extension to No. 13 Grafton Crescent will not be visible from within the conservation area, due to its low profile, ensuring it sits behind the parapet and is lower than the chimney pots which are just visible from the street. As such, it is considered overall to have a **neutral** impact on the contribution that the site makes to the character and appearance of the Conservation Area. Therefore, the scheme is not considered to be in conflict with Section 72 of Planning (Listed Buildings & Conservation Areas) Act 1990.

5.0 Conclusions

- 5.1 This Heritage Statement has been prepared by Bidwells on behalf of Alexis Zegerman and Peter Graff in relation to the proposed roof extension at 13 Grafton Crescent, London.
- 5.2 The proposals seek to install a mansard roof extension, with dormer windows to the front and rear, to facilitate a fourth bedroom at the property.
- 5.3 This report considers the impact of the proposed scheme on the significance of the built heritage assets identified, including the contribution made by their settings. This approach to impact-assessment is required in order to satisfy the provisions of Section 72(1) of the Planning (Listed Buildings & Conservation Areas) Act of 1990 in relation to listed buildings and the National Planning Policy Framework (NPPF) where the impact of development on heritage assets or their settings is being considered (Paragraphs 194-206).
- 5.4 As a result of our assessments on site, it is considered that the proposed scheme would result in a **neutral** impact on the Kelly Street Conservation Area.
- 5.5 With regard to No. 13 Grafton Crescent, and the Grafton Crescent Terraces in general, Paragraph 203 requires a balanced judgement to be undertaken when considering impacts on non-designated assets. It is considered that the proposed scheme would result in a **neutral** impact on No. 13 Grafton Crescent, due to the high-quality nature of the mansard roof extension, and a **neutral** impact on the Grafton Crescent Terraces, due to the extension being hidden behind the parapet and not visible from the streetscape.
- 5.6 We therefore find that the proposed alterations to have paid special attention to the desirability of preserving or enhancing the character or appearance of the Kelly Street Conservation Area in accordance with Section 72(1). In addition to satisfying these provisions of the Act, the NPPF Paragraphs 194-206 are also satisfied.

APPENDIX 1

HERITAGE LEGISLATION, POLICY AND GUIDANCE SUMMARY

Planning (Listed Buildings & Conservation Areas) Act 1990

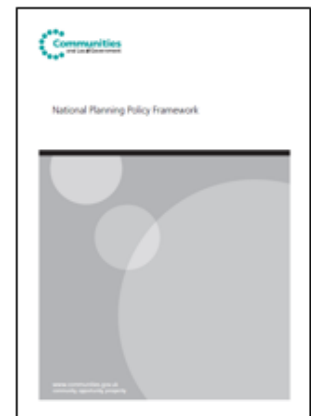
The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.

- Section 16(2) states “*In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*”
- Section 66(1) reads: “*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*”
- In relation to development on land within Conservation Areas, Section 72(1) reads: “*Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*”

As the proposal does not involve an application for Listed Building and is not within the settings of any listed buildings, Sections 16(2) and 66(1) do not apply in this instance.

National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) was revised in September 2023. With regard to the historic environment, the overarching aim of the policy remains in line with philosophy of the 2012 framework, namely that “our historic environments... can better be cherished if their spirit of place thrives, rather than withers.” The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.



This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a “*manner appropriate to their significance*” (Paragraph 189).

NPPF directs local planning authorities to require an applicant to “*describe the significance of any heritage assets affected, including any contribution made by their setting*” and the level of detailed assessment should be “*proportionate to the assets’ importance*” (Paragraph 194).

Paragraph 195 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their

settings. This Significance Assessment should be taken into account when considering the impact of a proposal, *“to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.

Paragraph 198 states that local planning authorities should have regard to the importance of the retention *‘in-situ’* of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.

Paragraph 199 requires that *“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.”*

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, *“clear and convincing justification”* (Paragraph 200). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to *‘wholly exceptional’* for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 states the following:

“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.”*

The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in *“less than substantial harm”*, paragraph 202 provides the following:

“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.”

It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a “*balanced judgement*” having regard to the scale of any harm or loss and the significance of the heritage asset.

The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

With regard to Conservation Areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. Whilst it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that “*proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.*”

Broader design guidance is given in Chapter 12, ‘Achieving well-designed places’. The 2021 NPPF introduces the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect ‘local character’ in order to create ‘*beautiful and distinctive places*’ (paragraph 127).

Paragraph 134 states that significant weight should be given to development which reflects local design polices, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the ‘standard of design’ providing they conform to the ‘overall form and layout of their surroundings.

Planning Practice Guidance (PPG) (2019)

The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.

In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.

In particular, the PPG notes the following in relation to the evaluation of harm: “*in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.*” (Ref ID: 18a-018-20190723).

This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a “high test”.

In relation to non-designated heritage assets, the NPPG explains the following:

“Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.”

It goes on to clarify that: “A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”

This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England Conservation Principles: Policies and Guidance 2008

Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

“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” (page 59).



Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that “*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.*” (page 10)

Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (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.*” (page 1)

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning Note 3 (Second Edition) (December 2017)

This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: '*A staged approach to proportionate decision taking*' provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

1. Step 1: Identify which heritage assets and their settings are affected
2. Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
3. Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
4. Step 4: Explore ways to maximise enhancement and avoid or minimise harm
5. Step 5: Make and document the decision and monitor outcomes

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities' decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.

The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Historic England Local Heritage Listing: Identifying and Conserving Local Heritage Advice Note 7 (January 2021)

This document provides information on local heritage listing of heritage assets such as buildings, monuments, sites, places, areas or parks, gardens and other designed landscapes, to assist community groups, owners, applicants, local authorities, planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG).

The advice in the document focuses on the production and review of local heritage lists but also helps in the general identification of non-designated heritage assets.

Regional Policy

The London Plan (2021)

The London Plan was adopted in March 2021, the following policies are relevant to heritage and this application.

Policy D1 London's form and characteristics

A. *Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:*

Form and layout

- 1) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*

Quality and character

- 12) *respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local character*
- 13) *be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.*

Policy HC1 Heritage conservation and growth

A. *Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*

B. *Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*

- 1) *setting out a clear vision that recognises and embeds the role of heritage in place-making*
- 2) *utilising the heritage significance of a site or area in the planning and design process*
- 3) *integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*

4) delivering positive benefits that sustain conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Policy

The Camden Local Plan (2017)

The Camden Local Plan was adopted on 3rd July 2017, the following policies are relevant to heritage and this application.

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;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*

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.”

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.

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:

g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area;

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.”

Kentish Town Neighbourhood Plan (2016)

The Kentish Town Neighbourhood Plan was adopted on 12th June 2016, the following policies are relevant to heritage and this application.

Policy D3 Design Principles

“Applications for the development of new and the redevelopment of existing buildings (which may include demolition, alteration, extension or refurbishment) will be supported where they meet the following criteria:

a) Proposals must be based on a comprehensive understanding of the site and its context

b) Proposals must be well integrated into their surroundings and reinforce and enhance local character, in line with paragraph 64 of the NPPF

c) Proposals must identify and draw upon key aspects of character, or design cues from the surrounding area. Appropriate design cues include grain, building form (shape), scale, height and massing, alignment, modulation, architectural detailing, materials, public realm and boundary treatments

d) Design innovation will be encouraged and supported where appropriate

e) Design proposals must be of the highest quality and sustainable, using materials that complement the existing palette of materials in the surrounding buildings”

APPENDIX 2

METHODOLOGY

Heritage Assets

A heritage asset is defined within the National Planning Policy Framework 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)” (NPPF Annex 2: Glossary).

‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.

The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that “*non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*” (Paragraph: 039 Reference ID: 18a-039-20190723)

However, the PPG goes on to clarify that “a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”

Meaning of Significance

The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the “*aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups*” (Page 2, Article 1.2)

The NPPF (Annex 2: Glossary) also defines significance as “the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”

The British Standards BS7913 (2013) notes that “the attributes that combine to define the significance of a historic building can relate to its physical properties or to its context. There are many different ways in which heritage values can be assessed.”

Significance can therefore be considered to be formed by a collection of values.

Assessment of Significance

It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 194 of the NPPF.

The Historic England document 'Conservation Principles' states that "understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment."

The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.

- Understanding the fabric and evolution of the asset;
- Identify who values the asset, and why they do so;
- Relate identified heritage values to the fabric of the asset;
- Consider the relative importance of those identified values;
- Consider the contribution of associated objects and collections;
- Consider the contribution made by setting and context;
- Compare the place with other assets sharing similar values;
- Articulate the significance of the asset.

At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset's significance. Historic England's 'Conservation Principles' sets out a grouping of values as follows:

Evidential value – *'derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.'* (Page 28)

Aesthetic Value – *'Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive.'* (Pages 30-31)

Historic Value – *'derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.'* (Pages 28-30)

Communal Value – *"Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated*

with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there". (Pages 31-32)

Historic England advice Note 12 notes that "interest may be archeological, architectural, artistic or historic.

The British Standards set out a simpler approach which 'is to think of a historic building's significance as comprising individual heritage values'. These could include townscape characteristics, artistic value, educational value and identity or belonging amongst others.

It is therefore clear that value-based assessment should be flexible in its application. It is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of setting/context to significance

In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.

Historic England's Conservation Principles defines setting as "an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape."

It goes on to state that "context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places" (page 39).

In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.

The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.

There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established 'James Semple Kerr method' which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This 'value hierarchy' has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.

The first stage of our approach is to carry out a thoroughly-researched assessment of the significance of the heritage asset, in order to understand its value:

Table 1 Assessment of Significance

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.

Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

Once the value/significance of an asset has been assessed, the next stage is to determine the assets 'sensitivity to change'. Table 2 sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.

An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that, according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).

Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

Table 2 Assessment of Sensitivity

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

Table 3 Assessment of Impact

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	Adverse: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction. Beneficial: The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.

High	<p>Adverse: Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>
Medium	<p>Adverse: Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p>Beneficial: Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
Minor/Low	<p>Adverse: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p>Beneficial: Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
Negligible	Barely discernible effect on baseline conditions but a slight adverse or beneficial impact.
Neutral	A change or effect which is neither adverse nor beneficial in impact.
Nil	No change in baseline conditions.

Summary of Assessment

Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is “*proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance*” as set out in Paragraph 194 of the National Planning Policy Framework.

Research Methodology

This Heritage Statement is the result of a robust process which assesses relevant documentary research (including HER records, maps, drawings and reports, as well as, archive material where relevant) and professional judgment.

APPENDIX 4

CONSERVATION AREA MAP

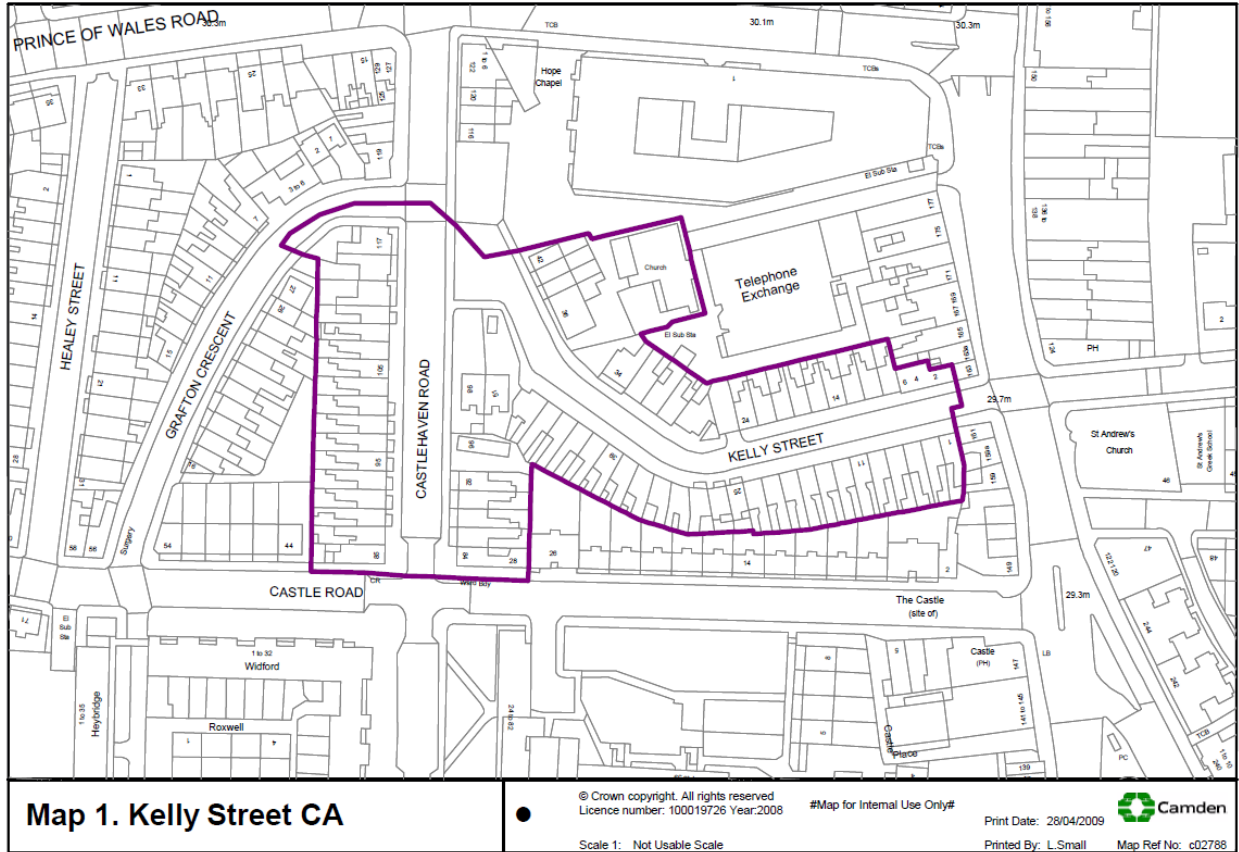


Figure 17: Kelly Street Conservation Area Map (Camden Council)



BIDWELLS