

Heritage Statement

33 Ferncroft Avenue London Camden NW3 7PG

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On behalf of: Mr & Mrs de la Chaise **Ref:** 0899

1.0 INTRODUCTION

- 1.1 This Heritage Statement has been prepared by Ignus Froneman, Director at Cogent Heritage, in consultation with the Applicant, XUL Architecture and SM Planning. The subject of the assessment is the grade II listed building at 33 Ferncroft Avenue, which is part of a semi-detached pair (33 & 35 Ferncroft Avenue), built in c. 1902 to the designs of CHB Quennell. The Heritage Statement supports a listed building consent application for internal and external changes to the house, which is now subdivided into flats, along with a change of use to a single dwelling: the original use that has been lost and compromised through subdivision into flats.
- 1.2 The proposed physical alterations have already been granted planning permission and listed building consent, under refs 2023/2904/P & 2023/3741/L (external, granted 12 February 2024) and 2023/2898/L (internal, granted 6 February 2024). However, in the absence of a permission to 33 Ferncroft Avenue to a single family dwelling, as it would have been originally, the extant planning permissions and listed building consents could not be practically implemented, as it is inherent in these proposals that the property would cease to be subdivided into four separate residential units, and instead would become a single family dwelling. The Heritage Statement therefore specifically considers whether the present proposals would result in heritage-specific benefits that would give weight to the acceptability of the reversion of the building to a single family dwelling.
- 1.3 The author of this report is a qualified heritage consultant with over 20 years of experience in the historic environment. This includes regular appearances as an expert witness at public inquiries, on behalf of both appellants, public bodies and local planning authorities.

Purpose of the report, heritage assets and research

- 1.4 The Heritage Statement assesses the effects of the proposed development on the heritage significance of the listed building. The application site falls in the Redington/Frognaal Conservation Area. Insofar as there would be any effect on the

conservation area, the assessment is undertaken on the basis that the effects of the external changes to the listed building would apply equally to the character, appearance and significance of the conservation area.

- 1.5 The Heritage Statement was informed by a site visit, in February 2024, and desk based documentary research. The inspection was non-intrusive, i.e. no surface/decorative treatments were removed to expose underlying fabric. Photos were taken on the site visit, a selection of which have been included to illustrate the report; they have not been altered, aside from cropping or annotation in some instances.
- 1.6 The purpose of the documentary research was to establish readily available sources of information about the history and evolution of the building. This is intended to be informative, but it is not intended to be comprehensive/exhaustive and it is therefore possible that other sources of information relating to the building exist.

Legislation and policy summary

- 1.7 The section below summarises the key provisions of s.66 & s.72 of the Planning Listed Buildings and Conservation Areas Act 1990, the National Planning Policy Framework and the Development Plan policies.
- 1.8 **Legislation:** Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act). Section 66(1) of the Act sets out the statutory duty in relation to development affecting the setting of listed buildings: and section 72(1) sets out the statutory duty in relation to any buildings or other land in a conservation area.
- 1.9 It is a well-established concept in case law that 'preserving' means doing no harm for the purposes of the 1990 Act. The Court of Appeal's decision in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] (EWCA Civ 137) established that, having 'special regard' to the desirability of preserving the setting of a listed building under s.66, involves more than merely giving weight to those matters in the planning balance. There is a strong statutory presumption against granting planning permission for any development which would fail to preserve a listed building or its setting (and the same for conservation areas). In cases where a proposed development would harm a listed building or its setting (or a conservation area), the *Barnwell* decision has established that the duty in s.66 of the Act requires these must be given "*considerable importance and weight*".

1.10 The key legal principles established in case law are:

- i. 'Preserving' for the purposes of the s.66 and s.72 duties means 'to do no harm'¹.
- ii. The desirability of preserving the setting of a listed building, or the character or appearance of a conservation area must be given 'considerable importance and weight'².
- iii. The effect of NPPF paragraphs 205-208 is to impose, by policy, a duty regarding the setting of a conservation area that is materially identical to the statutory duty pursuant to s.66(1) regarding the setting of a listed building (and s.72 in relation to the character and appearance of a conservation area)³.
- iv. NPPF paragraph 208 appears as part of a 'fasciculus' of paragraphs, which lay down an approach corresponding with the s.66(1) duty (and similarly the s.72 duty)⁴.
- v. If harm would be caused, then the case must be made for permitting the development in question, and the sequential test in paragraphs 206-208 of the NPPF sets out how that is to be done. If that is done with clarity, then approval following paragraph 208 is justified. No further step or process of justification is necessary⁵.
- vi. In cases where there may be both harm and benefits, in heritage terms, great weight has to be given to the conservation and enhancement of a listed building, and its setting, and the preservation and enhancement of a conservation area. It is, however, possible to find that the benefits to the same heritage assets may be far more significant than the harm⁶.
- vii. An impact is not to be equated with harm; there can be an impact which is neutral (or indeed positive)⁷.

1.11 **The National Planning Policy Framework:** Section 16 of the revised (December 2023) National Planning Policy Framework (the NPPF) deals with conserving and enhancing the historic environment, in paragraphs 195 to 214. Paragraph 195 of the

¹ *South Lakeland District Council v Secretary of State for the Environment* [1992] 2 AC 141 per Lord Bridge at p.146E-G in particular (obiter but highly persuasive).

² *Bath Society v Secretary of State* [1991] 1 WLR 1303, at 1319 per Glidewell LJ and South Northamptonshire DC v SSCLG [2014] EWCA Civ 137 (Barnwell Manor), at [22-29] per Sullivan LJ.

³ *Jones v Mordue* [2015] EWCA Civ. 1243 per Sales LJ [at 28].

⁴ *Jones v Mordue* [at 28] per Sales LJ.

⁵ *R (Pugh) v Secretary of State for Communities and Local Government* [2015] EWHC 3 (Admin) as per Gilbert J [at 53].

⁶ *R (Safe Rottingdean Ltd v Brighton and Hove CC* [2019] EWHC 2632 (Admin) as per Sir Ouseley [at 99].

⁷ *Pagham Parish Council v Arun District Council* [2019] EWHC 1721 (Admin) (04 July 2019), as per Andrews, J DBE at 38.

NPPF states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

- 1.12 According to paragraph 200 applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 1.13 According to paragraph 205, which applies specifically to designated heritage assets, great weight should be given to a heritage asset's conservation (the more important the asset, the greater the weight should be). This reflects the provisions of the 1990 Act in that it applies irrespective of whether it involves total loss, substantial harm, or less than substantial harm to significance.
- 1.14 Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. It then deals with substantial harm to, or total loss of significance of, different types of designated heritage assets. Paragraph 207 continues on the subject of substantial harm.
- 1.15 Paragraph 208, on the other hand, deals with less than substantial harm. Harm in this category should be weighed against the public benefits of the proposal. The National Planning Practice Guidance (NPPG) describes public benefits as "*anything that delivers economic, social or environmental progress*".
- 1.16 **The Development Plan** is the London Plan (2021) and Camden's Local Plan (2017).
- 1.17 **The London Plan:** The London Plan 2021 deals with Design at Chapter 3. Policy D4 deals with delivering good design and states that the design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising appropriate analytical tools. The design quality of development should be retained through to completion by, amongst others, ensuring maximum detail appropriate for the design stage is provided.
- 1.18 Policy HC1, entitled "*Heritage conservation and growth*" is the most relevant of the policies in Chapter 7. Parts A and B of the policy deals with strategic considerations/requirements and these are not relevant to determining planning applications.
- 1.19 Part C deals with development proposals affecting heritage assets, and their settings. This part of Policy HC1 requires development proposals to conserve the significance of heritage assets, by being sympathetic to the assets' significance and appreciation within

their surroundings. The policy also requires the cumulative impacts of incremental change from development on heritage assets and their settings to be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.

- 1.20 **Camden's Local Plan (2017)**: Policy D2 deals with heritage and requires development to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. According to the policy, the Council will not permit development that results in less than substantial harm to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. Specifically in relation to listed buildings, the Council will (amongst others), resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.

2.0 ASSESSMENT OF SIGNIFICANCE

Historic background overview

- 2.1 Redington/Frogna Conservation Area Character Appraisal & Management Plan has a section on Charles Henry Bourne Quennell (1872–1935), the architect of the pair at 33 & 35 Ferncroft Avenue and this is quoted below:

Charles Quennell

The architectural character of a large amount of the conservation Area is the result of a highly prolific partnership between the architect Charles H.B. Quennell and the Irish builder-developer George Washington Hart. Due to their dominance in the production of houses in the northern part of the Conservation Area, accounting for roughly one hundred houses over a period of sixteen years, it has been dubbed "Quennell-land" by Service (1989) and Cherry and Pevsner (1998). In 1896 Hart started developing land on either side of Platt's land including Briardale and Clorane Gardens to the north and Rosecroft, Hollycroft and Ferncroft Avenues to the south. Whilst not all of this area was developed by the Quennell/Hart partnership, their houses make up a large proportion of the dwellings on each road. Development began in the late 1890's at the western end of Platt's Lane and at the ends of Briardale and Clorane Gardens nearest to it. This was followed by the development of larger houses at the northern end of Ferncroft Road (Nos. 3-23; and Nos. 2-18). From 1904 Quennell and Hart built stretches of Redington Road and Heath Drive, then Oakhill Avenue and parts of Kidderpore Avenue from 1906. Further stretches of Redington Road, Redington and Templewood Gardens and Templewood Avenue formed the final stages of the partnership from 1910-1914.

Quennell adopted a variety of styles for his houses ranging from restrained Arts and Crafts to more formal Neo-Georgian. He used rich red and soft orange brickwork, clay roof tiles, occasional areas of tile hanging and render, gables, and bay and dormer windows.

During the development of the Redington / Frognal area, Hart set up an on-site sales office – first on the corner of Ferncroft and Hollycroft Avenues and later on the corner of Redington Road and Templewood Avenue. Potential buyers would be shown plans of houses under construction and then taken on a tour to any sites that took their interest. According to Service (1989) there was a considerable turnover of owners of the new properties in the early years, possibly due to property speculation. Hart had a house at No. 20 Redington Road built for him, which was presumably designed by Quennell. [...]"

- 2.2 The 1896 Ordnance Survey map (**Fig 1**) shows the reservoir in place, but with Ferncroft Avenue still undeveloped; some plots nearby can be seen laid out, but with few buildings and a largely rural character. The 1915 Ordnance Survey map (**Fig 2**) shows Ferncroft Avenue developed, and with the footprint of 33 & 35 Ferncroft Avenue in place. Despite changes that have occurred to the building since then, the footprint of the building has remained unchanged in the Ordnance Survey map sequence.

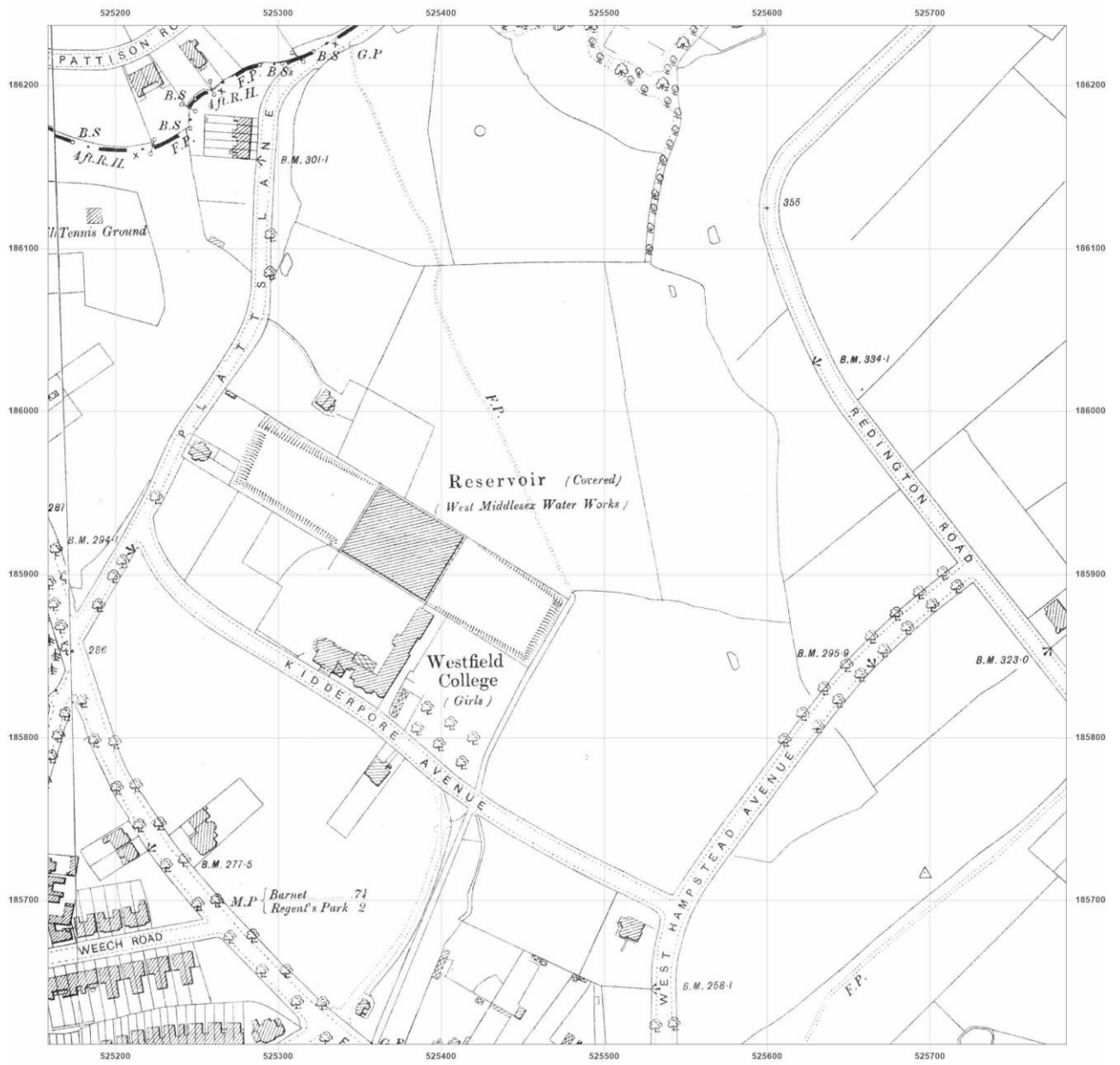


Fig 1: An extract of the 1896 Ordnance Survey map.



Fig 2: An extract of the 1915 Ordnance Survey map, with 33 Ferncroft Avenue highlighted.

2.3 The pair is recorded on aerial photos taken in the 1940 (**Figs 3-6**), albeit these are generally grainy and do not show much detail, although the symmetry of the pair at 33 & 35 Ferncroft Avenue is striking on the images.

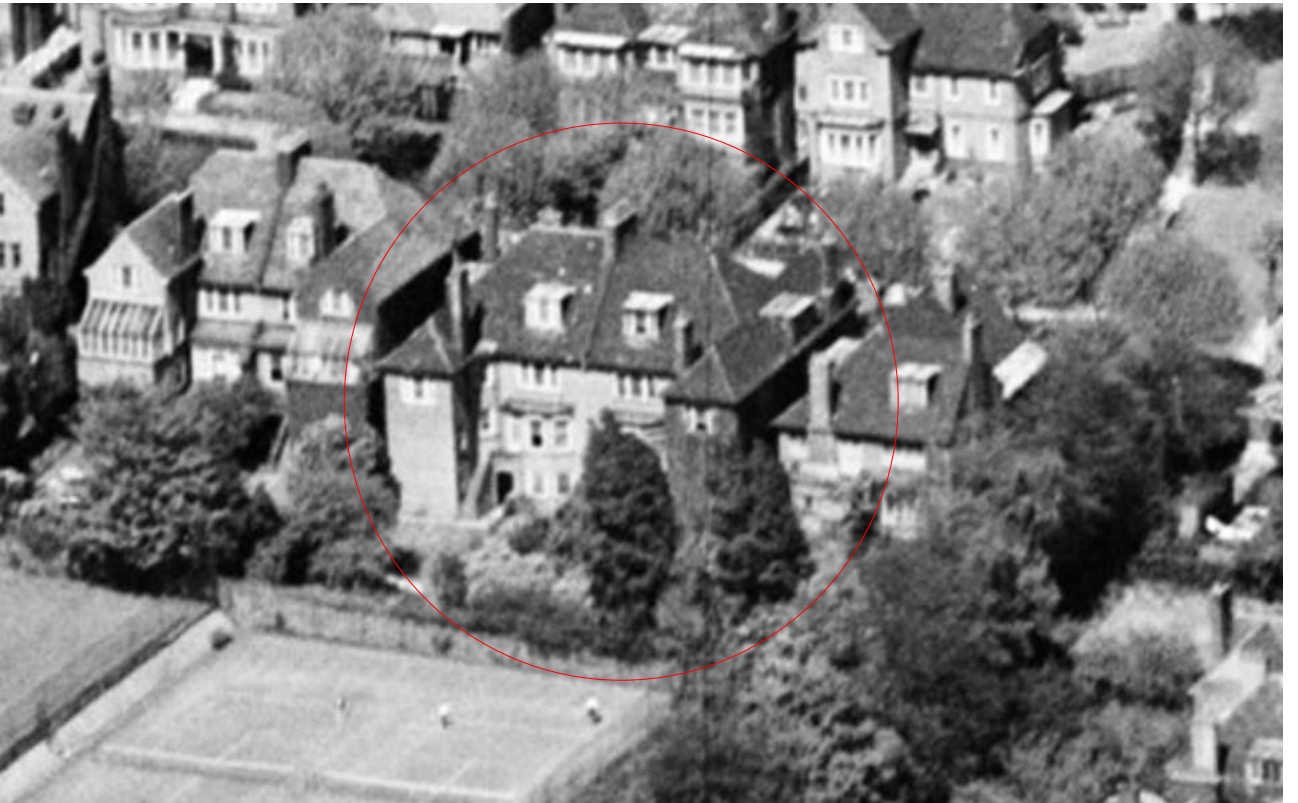


Fig 3: An oblique aerial photo of the rear of 33 & 35 Ferncroft Avenue from the south, taken in 1946. © HES



Fig 4: A vertical aerial photo of the rear of 33 & 35 Ferncroft Avenue, taken in 1946. © Historic England



Fig 5: A vertical aerial photo of the rear of 33 & 35 Ferncroft Avenue, taken in 1946. © Historic England



Fig 6: An oblique aerial photo of the rear of 33 & 35 Ferncroft Avenue from the SW, taken in 1948. © HES

2.4 The planning history records that the building was altered in c. 1981, when a very small flat was created within the ground floor/lower ground floor of the house. This involved the insertion of a convoluted little spiral staircase into, and the subdivision of, the

principal ground floor room, as can be seen highlighted in red on the proposed drawing below (**Fig 7**). A suspended ceiling was inserted (**Photo 1**) and the chimneybreast was overlapped by a partition and cupboards (these have been removed - **Photo 2**). This was evidently harmful to the legibility and fabric of the listed building.

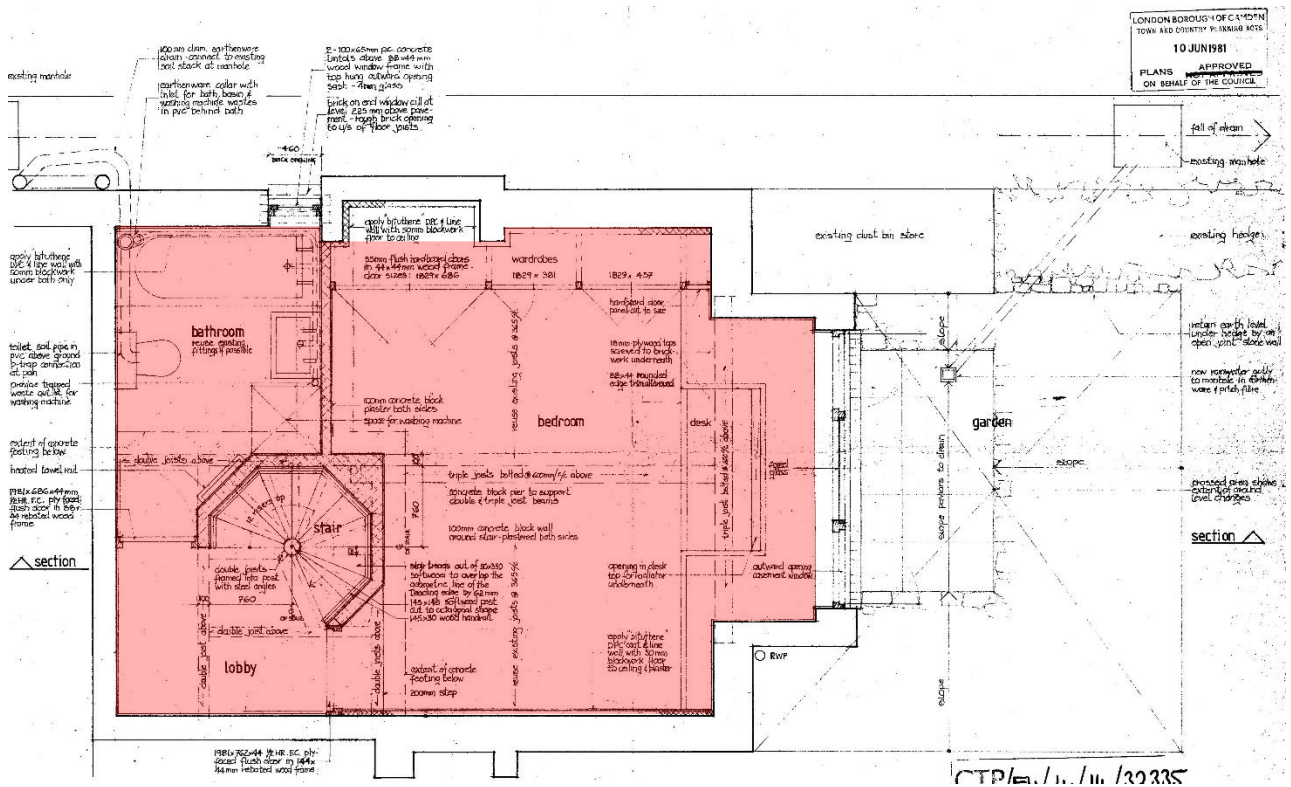


Fig 7: An extract of the 1981 proposed ground floor.



Photo 1: The suspended ceiling, with what appears to be the residual original cornice, in the former large front ground floor room of 33 Ferncroft Avenue.



Photo 2: The chimneybreast in the former large front ground floor room of 33 Ferncroft Avenue is overlapped by a partition; the (presumed original) tiled hearth can be seen on the floor.

- 2.5 In 2010, permission was granted for the amalgamation of two flats into a single unit, also across the ground floor and lower ground floor, but this time at the rear of the house. As part of this, a new staircase had been inserted between the ground floor and lower ground floor. This, again, was harmful to the legibility and fabric of the listed building.

Significance

- 2.6 The pair at 33 & 35 Ferncroft Avenue was listed on 11 January 1999, on the same day that many other houses in the Hampstead area were listed. The main descriptive text from the list entry is quoted below:

"Pair of semi-detached houses. 1902. By CHB Quennell; built by GW Hart. Red brick. Tiled gabled and hipped roofs with tile-hung gabled dormers and overhanging bracketed eaves. Symmetrically designed pair. 2 storeys and attics. 3 windows each. Projecting gabled outer bays with further projecting bays forming bay windows through the ground and 1st floor with hipped half roofs; tripartite sashes and narrow sashes to cheeks; gables with acroteria. Entrance bays, slightly projecting on angle of outer and central bays, have round-arched porches with sash windows above. Central bays at ground floor continue line of entrance bays with tripartite sashes under penthouse roofs having a stone coped parapet at the line of the party wall. 1st floor corresponding tripartite sashes with the party wall roof parapet continuing onto the wall as a stepped corbel. INTERIORS: not inspected."

- 2.7 *Pevsner*⁸ briefly mentions the house as a building by Quennell, but it is not described or discussed.
- 2.8 The significance of the pair at 33 & 35 Ferncroft Avenue is attributable to its architectural and historic interest. In essence, the building is a reasonably well preserved example of a pair of houses in Quennell's characteristically deft handling of a traditional style; the pair displays a strong Arts & Crafts influence, albeit belied by the equally strong symmetry (**Photos 3 & 4**). The pair provides physical evidence of this Quennell's design legacy, in particular so in a neighbourhood where he built many contemporary speculative houses in partnership with Hart. The building, as with the others in the area, is an example of Quennell's earlier work.
- 2.9 The house is also of historic interest as part of the original development of this part of Hampstead in the late C19. It is recognisable as a good quality historic house and it makes a valuable contribution to the wider group of houses in a similar style, by Quennell and by other leading architects of the time.

⁸ Cherry and Pevsner, *The Buildings of England. London 4: North* (London, 1998) p. 238



Photo 3: A frontal view of 33 & 35 Ferncroft Avenue.



Photo 4: An aerial view of the front of 33 & 35 Ferncroft Avenue.

- 2.10 The exterior displays architectural quality, and although the frontage of the pair is still largely symmetrical, the garage at 35 Ferncroft Avenue obviously upsets the symmetry of the façade.
- 2.11 The loss of symmetry (and later alterations) is much notable at the rear, where 33 & 35 Ferncroft Avenue have seen some unfortunate modifications (**Photo 5**). Some of the obvious changes that can be noted are:
- i. The removal of the distinctive external ground floor stairs to the garden at 35 Ferncroft Avenue.
 - ii. The rear conservatory at 35 Ferncroft Avenue.
 - iii. The mismatching dormers to 33 & 35 Ferncroft Avenue and the crude and unsightly timber balustrade at 33 Ferncroft Avenue (the aerial photos show that there were small dormers by 1946, probably original, but by 1948 the dormer to 35 Ferncroft Avenue had been enlarged).
 - iv. The addition of a secondary dormer to 33 Ferncroft Avenue.
 - v. The modification of the first floor window to a door at 33 Ferncroft Avenue and the creation of a balcony with a crude and unsightly timber balustrade at 33 Ferncroft Avenue.



Photo 5: An elevated, oblique view of the rear elevations of 33 & 35 Ferncroft Avenue.



Photo 6: An elevated view of the rear elevation of 7 & 33 & 35 Ferncroft Avenue.

2.12 Some of the other, more subtle changes include:

- i. The insertion of windows (and a French door at 35 Ferncroft Avenue) at the lower floors of the rear projecting wings; the 1940s aerial photos show these were blind at the lower levels. The openings and matching windows that were created at 35 Ferncroft Avenue are sympathetic to the style of the house, and look almost original, whereas those at 33 Ferncroft Avenue are crude and unsympathetic.
- ii. Both of the rear projecting wings had windows on the inside faces, and these have been blocked at both properties.
- iii. A retractable awning has been fitted above the balcony at 33 Ferncroft Avenue.

iv. The 1940s aerial photos show there were originally chimneystacks to the rear projecting wings, which have also been lost on both properties.

2.13 The interior of 33 Ferncroft Avenue has been subject to relatively comprehensive remodelling, presumably in connection with the subdivision of the property into a series of flats, prior to its listing in 1999. These include obvious changes to the plan form, and the removal of most historic features. There are modern ceilings with spot lights throughout, and although there are cornices, these look to be modern replicas rather than the original ones (the moulding profiles of the cornices appear to be correct, judging from the fossilised cornice in the suspended ceiling of the ground floor front room as noted above). The staircase appears to be in part original, although it has been modified on the first floor to make a tighter turn, which gained space for the first floor (and second floor) flats; that can be seen on the annotated **Photo 7** below, which shows the new flight in front of the original flight. The plain modern front door to the first floor flat can also be seen.



Photo 7: A photo of the staircase from the ground floor landing, with the original flight highlighted in red, and the inserted flight highlighted blue.



Photo 8: The ground floor stairwell, with the inserted flight above highlighted blue.

- 2.14 The first floor flat has been constructed with a very odd and heavy-looking, projecting 'cornice' that is wholly inappropriate, but which permeates through the entire floor in all rooms (e.g. **Photos 9 & 10**). This has been an especially damaging intervention.



Photo 9: The very odd and heavy-looking, projecting 'cornice' at the front room of the first floor flat.



Photo 10: The very odd and heavy-looking, projecting 'cornice' at the rear of the first floor flat.

2.15 The flat on the second floor/attic space is plain and unremarkable (**Photo 11**), and the absence of features here probably reflect the lower hierarchical status of this part of the building. The floorboards appear to be original.



Photo 11: The second floor/attic space is plain and unremarkable.

2.16 Turning then to the plan form and use of the building, the subdivision into separate flats has inevitably led to the fragmentation of the originally interconnected and spatially integrated single dwelling into a series of separate 'compartments'. This has damaged the ability to get a proper sense of the building as a whole, rather than as fragmented, segregated and self-contained compartmentalised parts. The conversion, although relatively sympathetic in the sense that the upper floors are given over to a single flat per floor, has also resulted in the inevitable compartmentalisation of principal rooms and the consequent impact on the legibility of the floor plan, hierarchy and spatial arrangement of the house. At the ground and lower ground floors, where there has been more subdivision, the impact has been greater.

2.17 Another inevitable consequence of the subdivision is the most unfortunate external manifestations of the creation of multiple units. At the entrance, the mailboxes for each flat and intercom again detract from the quality and character of the building (**Photo 12**).



Photo 12: The front entrance, fitted with an intercom and mailboxes for each flat.

2.18 Another manifestation is the plethora of bins, serving the different flats in the building
(Photos 13 & 14).



Photo 13: The plethora of bins, serving the different flats in the building.



Photo 14: The plethora of bins, serving the different flats in the building.

2.19 On the whole, 33 Ferncroft Avenue has retained much of its original character to the façade, and a good deal of character at the rear, despite some very unfortunate changes (such as the unsympathetic balustrades and windows, which have upset the sense of symmetry). Internally, however, there are few features of note and the main staircase has been modified in a way that has harmed the generosity of space it would originally have conveyed. Coupled with that is the fragmentation of the plan form, the poor quality additions, such as the plain modern front doors to the flats, and the most inappropriate 'cornice' to the first floor flat, as well as the compartmentalisation throughout, from the lower ground floor to the second floor.

3.0 IMPACT ASSESSMENT

Overview

3.1 The proposals can be summarised as:

- i. Internal alterations, including:
 - the reconfiguration of the lower ground floor, with the removal of two later inserted staircases and a subdividing inserted room in the front room;
 - the reconfiguration of the ground floor, with the removal of two subdividing inserted rooms in the front rooms, and non-original modern stud walls at the rear, and the removal of false ceilings;
 - the reconfiguration of the first floor, with the removal of the later inserted stairs flight and compartmentalised hall, and the removal of a subdividing inserted room in the front room, the replacement of the unsympathetic 'cornice' with appropriate replicas, and minor reconfiguration of modern stud walls;
 - the reinstatement of a second floor landing and associated rationalisation of the plan form; and
 - the relocation, creation and adjustment to non-original door openings, replacement of non-original skirtings, and internal decoration throughout walls and ceilings.
- ii. External alterations, including:
 - the enlargement of the existing lower ground floor and ground floor level rear windows, and replacement with traditional sash windows;
 - the replacement of the concrete lintels to the lower and ground floor rear windows, with arched brick heads;

- the removal of the projecting pelmets/hoods to the lower and ground floor rear windows;
 - replacement of the first floor rear timber balustrade and with a simple, painted steel balustrade;
 - replacement of the existing terrace door with double doors and side windows;
 - replacement of the existing second floor/roof level door and side light with a double door;
 - replacement of the existing timber balustrade to be replaced with a simple, painted steel balustrade;
 - reduction in width and lowering of the sill to the second dormer window, and replacement of the window with sash window;
 - removal of render and reinstatement of brickwork underneath;
 - at lower ground floor of the side elevation, replacement of an existing, non-original louvred grille with painted timber sash window;
 - at lower ground floor of the side elevation, removal and bricking-up of four modern window openings; and
 - replacement of the existing casements to the side dormer with sash windows.
- iii. Change of use to a single family dwelling.

Assessment

3.2 Internal alterations:

- 3.2.1 The reconfiguration of the lower ground floor, with the removal of two later inserted staircases and a subdividing inserted room in the front room, would materially enhance the significance of the building.
- 3.2.2 The removal of the inserted staircases would restore the principal original staircase as the only staircase between the ground and lower ground floors, significantly improving the legibility of the building.
- 3.2.3 The removal of the subdividing inserted room in the front room of the lower ground would again improve the legibility of the building.
- 3.2.4 Integrating the floor layout into that of a single dwelling, with spatial interconnections between rooms and spaces, rather than the segregated present arrangement, would improve the legibility of the building.

- 3.2.5 The reconfiguration of the ground floor, with the removal of two subdividing inserted rooms in the front rooms, and non-original modern stud walls at the rear, would improve the legibility of the building.
- 3.2.6 The removal of the false ceilings and the repair/reinstatement of the original cornice, would improve the legibility of the building.
- 3.2.7 Integrating the floor layout into that of a single dwelling, with spatial interconnections between rooms and spaces, rather than the segregated present arrangement of two front doors to separate flats, would improve the legibility of the building.
- 3.2.8 The reconfiguration of the first floor, with the removal of the later inserted stairs flight and compartmentalised hall, would reinstate a compromised original arrangement to the staircase, a key feature of the house, and improve the legibility of the building.
- 3.2.9 The removal of a subdividing inserted room in the front room, would improve the legibility of the building.
- 3.2.10 The replacement of the unsympathetic 'cornice' with appropriate replicas, would greatly improve the legibility of the first floor of the building.
- 3.2.11 The minor reconfiguration of modern stud walls would have no effect on the legibility of the first floor of the building.
- 3.2.12 The removal of the front door to the separate flat, and integration of the first floor into the rest of the building, as part of a single dwelling, rather than the segregated present arrangement, would improve the legibility of the building.
- 3.2.13 The reinstatement of a second floor landing would improve the legibility of the building.
- 3.2.14 The associated rationalisation of the plan form by reconfiguring later/modified walls, would leave the legibility of the building unaffected.
- 3.2.15 The removal of the front door to the separate flat, and integration of the second floor into the rest of the building, as part of a single dwelling, rather than the segregated present arrangement, would improve the legibility of the building.
- 3.2.16 The relocation, creation and adjustment to non-original door openings, the replacement of non-original skirtings, and internal decoration throughout to the walls and ceilings

would preserve and enhance the significance of the building, by reinstating more appropriate joinery (e.g. skirting).

3.3 External alterations

- 3.3.1 The enlargement of the existing lower ground floor and ground floor level rear windows, and their replacement with traditional sash windows would replace poor quality, unsympathetic insertions with windows that not only better reflect the style of the building, but importantly also reinstates something of the compromised symmetry at the rear of the semi-detached pair. This would markedly improve the legibility of the building's design intent and architectural quality.
- 3.3.2 The replacement of the concrete lintels to the lower and ground floor rear windows, with arched brick heads would replace poor quality, unsympathetic insertions with window openings that not only better reflect the style of the building, but importantly also reinstates something of the compromised symmetry at the rear of the semi-detached pair. This would markedly improve the legibility of the building's design intent and architectural quality.
- 3.3.3 The removal of the projecting pelmets/hoods to the lower and ground floor rear windows would remove poor quality, unsympathetic insertions and also reinstate something of the compromised symmetry at the rear of the semi-detached pair. This would markedly improve the legibility of the building's design intent and architectural quality.
- 3.3.4 The replacement of the crude and clumsy first floor rear timber balustrade with a simple, painted steel balustrade would remove a poor quality, unsympathetic insertion and replace it with a visually lighter, less intrusive and more appropriate balustrade. This would markedly improve the legibility of the building's design intent and architectural quality.
- 3.3.5 The replacement of the existing first floor terrace door with double doors and side windows would represent a minor improvement by introducing more fitting and sympathetic top lights.
- 3.3.6 The replacement of the existing second floor/roof level door and side light with a double door would represent a minor improvement by introducing more fitting and sympathetic joinery.
- 3.3.7 The replacement of the existing crude and clumsy second floor timber balustrade with a simple, painted steel balustrade would remove a poor quality, unsympathetic insertion

and replace it with a visually lighter, less intrusive and more appropriate balustrade. This would markedly improve the legibility of the building's design intent and architectural quality.

- 3.3.8 The reduction in width and lowering of the sill to the second dormer window, and replacement of the window with sash window would represent a minor improvement by introducing more fitting and sympathetic joinery and a reduction in the dormer.
- 3.3.9 The removal of render and reinstatement of brickwork at the lower ground floor rear elevation would reintroduce the original finish and represent a minor improvement.
- 3.3.10 The replacement of an existing, non-original louvred grille with painted timber sash window at the lower ground floor of the side elevation would represent a minor improvement by replacing a detracting feature with more fitting and sympathetic joinery.
- 3.3.11 The removal and bricking-up of four modern window openings at the side elevation would represent a minor improvement improving the legibility of the building's design intent.
- 3.3.12 The replacement of the existing casements to the side dormer with sash windows would represent a minor improvement by introducing more fitting and sympathetic joinery.

3.4 Change of use to a single family dwelling

- 3.4.1 The change of use of the building to a single family dwelling would facilitate the enhancements to the building, as noted above. As noted in the introduction, the physical changes have been granted consent/permission, but without the associated change in use, the beneficial changes cannot be practically implemented. The change of use of the building to a single family dwelling is therefore the only mechanism to secure the material benefits/enhancements itemised above.
- 3.4.2 It can also be noted that this change of use to a single family dwelling would reinstate the originally intended use of the house, thereby better revealing its design intent. There can be no doubt that this would materially enhance the ability to appreciate the building's significance. The change of use would also facilitate the removal of the letterboxes at the entrance porch, and provide the building with a less intense use. The plethora of bins that clutter the front garden would be reduced, enhancing the setting of the house.
- 3.4.3 The reversion of the house to a single family dwelling would be beneficial in its own right, as well as facilitating implementation of the consented material enhancements. In

accordance with paragraph 205 of the NPPF, great weight should be given to aspect of the proposed development.

3.5 Overall conclusions:

3.5.1 The proposals are summarised in tabular form below:

Proposal	Assessment
Lower ground floor	
Reconfiguration of the lower ground floor, with the removal of two later inserted staircases and a subdividing inserted room in the front room.	Material enhancement to the significance of the listed building.
Ground floor	
Reconfiguration of the ground floor, with the removal of two subdividing inserted rooms in the front rooms, and non-original modern stud walls at the rear, and the removal of false ceilings.	Material enhancement to the significance of the listed building.
First floor	
Reconfiguration of the first floor, with the removal of the later inserted stairs flight and compartmentalised hall, and the removal of a subdividing inserted room in the front room, the replacement of the unsympathetic 'cornice' with appropriate replicas, and minor reconfiguration of modern stud walls.	Material enhancement to the significance of the listed building.
Second floor	
Reinstatement of a second floor landing and associated rationalisation of the plan form.	Material enhancement to the significance of the listed building.
General internal changes	
Relocation, creation and adjustment to non-original door openings, replacement of non-original skirtings, and internal decoration throughout walls and ceilings.	Preservation and enhancement of the significance of the listed building.
External	
Replacement of the concrete lintels to the lower and ground floor rear windows, with arched brick heads.	Material enhancement to the significance of the listed building.
Removal of the projecting pelmets/hoods to the lower and ground floor rear windows.	Material enhancement to the significance of the listed building.

Proposal	Assessment
Replacement of the first floor rear timber balustrade and with a simple, painted steel balustrade.	Material enhancement to the significance of the listed building.
Replacement of the existing terrace door with double doors and side windows.	Material enhancement to the significance of the listed building.
Replacement of the existing second floor/roof level door and side light with a double door.	Enhancement to the significance of the listed building.
Replacement of the existing timber balustrade to be replaced with a simple, painted steel balustrade.	Material enhancement to the significance of the listed building.
Reduction in width and lowering of the sill to the second dormer window, and replacement of the window with sash window.	Material enhancement to the significance of the listed building.
Removal of render and reinstatement of brickwork underneath at the rear lower ground elevation.	Material enhancement to the significance of the listed building.
Replacement of an existing, non-original louvred grille with painted timber sash window at the lower ground floor of the side elevation.	Material enhancement to the significance of the listed building.
Removal and bricking-up of four modern window openings at the side elevation.	Material enhancement to the significance of the listed building.
Replacement of the existing casements to the side dormer with sash windows.	Enhancement to the significance of the listed building.
Change of use	
Change of use of the building to a single family dwelling.	The reversion of the building to a single family dwelling would facilitate the enhancement noted above, as well as being inherently beneficial.

3.5.2 Overall, it is unsurprising that the physical changes that form part of the present proposal have already been granted consent/permission. These would individually and cumulatively considerably enhance the significance of the listed building. Given that the reversion of the building to a single family dwelling would facilitate these enhancements, as well as being inherently beneficial, there is a clear and compelling heritage imperative to grant permission for the proposed reversion of the building to a single family dwelling.

4.0 CONCLUSIONS

- 4.1 This report presents a proportionate assessment of the significance of the listed pair at 33 & 35 Ferncroft Avenue. The effects of the proposals on the significance of the listed building have also been assessed.
- 4.2 The assessment in this report has demonstrated that the listed building has been subject to much internal reconfiguration, and that the proposed internal and external alterations would preserve and materially enhance the significance of the listed building. The reversion of the building to a single family dwelling would facilitate these enhancements, as well as being inherently beneficial.
- 4.3 Because no harm has been identified, there are no policy conflicts with the Development Plan. The proposed development also complies with the statutory duties in s.66 and s.72 of the Planning Listed Buildings and Conservation Areas Act, 1990. In terms of the balancing exercise, as per paragraph 208 of the National Planning Policy Framework, there is a clear and compelling heritage imperative to grant permission for the proposed reversion of the building to a single family dwelling.