



Heritage Statement

**18A Frogna Gardens,
London, NW3 6XA**

For:

Christopher Holdsworth, Campels Capital Ltd

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Ref: 4346

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Appendix A Heritage Planning Policy Context

1 Introduction

- 1.1 This Heritage Statement has been prepared by Smith Jenkins Planning & Heritage on behalf of Christopher Holdsworth, Campels Capital Ltd, in support of the planning application for the proposed development at 18A Frognal Gardens, London, NW3 6XA (hereafter referred to as the 'Site').
- 1.2 Located in the historic neighbourhood of Hampstead within the London Borough of Camden (LBC), the Site is a 1960s semi-detached, single family dwellinghouse. It was built as one of a pair of Modernist style houses, although with differing elevational treatments, and is two storeys with a lower ground floor garage.
- 1.3 This application follows a recently refused scheme (application reference: 2024/1850/P), which was considered unacceptable by LBC, resulting from the proposed roof extension. The remainder of the application was deemed acceptable. The revised proposals have had the benefit of pre-application discussions and were received positively by the Council. Whilst largely similar to the previous scheme, the proposals now comprise a two-storey rear extension in place of the previously proposed roof extension.
- 1.4 A Certificate of Lawfulness (2024/1852/P) has also been granted for the single storey rear extension which is covered under Permitted Development. Thus, the single storey rear extension has been accepted in principle and planning permission is not required for these works. As such this report will only assess the extension to the first floor as it is not covered under Permitted Development.
- 1.5 The development proposals for the current application comprise:
- *Part single storey and part two storey rear extension;*
 - *Conversion of garage to habitable space including front extension and replacement of garage door with windows and cladding panels;*
 - *Zinc cladding to upper ground floor front window;*
 - *Side porch extension including addition of a rooflight and cladding material change from spandrel panel to zinc cladding;*
 - *Replacement of existing windows with metal framed double-glazed units;*
 - *Installation of photovoltaic solar panels and two rooflights on existing flat roof of the host property;*
 - *Landscaping works to rear with associated alterations;*
 - *Installation of Air Source Heat Pump external unit.*
- 1.6 Whilst the Site itself is not designated, nor considered a non-designated heritage asset, it is located within the Hampstead Conservation Area (CA).

Legislative and Policy Context

- 1.7 Paragraph 200 of the National Planning Policy Framework (NPPF) 2023 sets out the information requirements for determining applications and states that:

‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made to 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

- 1.8 This Heritage Statement is a standalone document prepared to satisfy paragraph 200 of the NPPF. In response to these policy requirements, Section 2 of this report identifies the heritage assets which may be affected by the application proposals. Section 3 provides statements of significance for the heritage assets identified within Section 2. These are relative to the scale, nature and effect of the proposed development.
- 1.9 Section 4 provides an assessment of the application proposals on the significance of the identified heritage assets, based on national, regional and local policy and guidance, with the conclusions set out in Section 5. The heritage planning policy context for the consideration of these application proposals is set out in Appendix A. This includes in the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, regional and local planning policy.

¹ NPPF (2023)

2 The Heritage Assets

2.1 A heritage asset is defined by the NPPF as:

‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)’.²

Designated Heritage Assets

2.2 A designated heritage asset is described by the NPPF as:

‘A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.’³

2.3 Such assets are statutorily identified as having a level of heritage (architectural and/or historic) interest to justify designation. There are then particular procedures in planning decisions to ensure that their special interest is preserved or enhanced.

Conservation Areas

2.4 The Site is located within the Hampstead CA, and it therefore has the potential to be impacted by the proposed development.

2.5 As stated in the pre-application response from the Council (dated 07/08/2024), the only heritage asset, whether designated or non-designated, with the potential to be impacted by the application proposals is the Hampstead CA. As such, it is the only heritage asset considered within the scope of this assessment.

² NPPF (2023) Annex 2: Glossary (p.70)

³ NPPF (2023) Annex 2: Glossary (p.69)

3 Significance

- 3.1 The significance of a heritage asset is defined within the glossary of the NPPF (2023) 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’.*⁴

- 3.2 Listed buildings are statutorily designated and, for the purposes of the NPPF, are designated heritage assets. Recognising this statutory designation, buildings must hold special architectural or historic interest. The Department of Culture, Media and Sport publish the ‘Principles of Selection for Listed Buildings (2010)’ which is supported by thematic papers, ‘Listing Selection Guides’, based on building type, which give more detailed guidance.
- 3.3 Conservation Areas are identified if they are of special architectural or historic interest, the character or appearance of which should be preserved or enhanced. Historic England has published guidance on the designation of Conservation Areas which provides a framework for the identification of those features that form the character and appearance (*Conservation Area Appraisal, Designation and Management: Historic England Advice Note 1*).
- 3.4 The identification of a site as a non-designated heritage asset does not provide any legal protection of such asset, however, for the purposes of the NPPF, they are a material consideration in the determination of applications.

Assessment

- 3.5 The following statements of significance for the identified heritage assets (set out in Section 2) are proportionate to the importance of the asset and the likely impact of the proposals.

Hampstead Conservation Area

- 3.6 The Hampstead CA was designated in 1968 and has since been extended on several occasions, most recently in 2001. The Hampstead CA Statement was adopted in 2001 and provides a brief overview of the history and character of the area, as well as setting out key guidelines for development proposals within the area.

Historic Development

- 3.7 The CA covers the historic area of Hampstead, which is situated at an elevated position atop hills to the north of the City of London. It was recorded as a Saxon manor given to the monastery at Westminster by King Ethelred the Unready in 986 AD. In the medieval period the manor had a village with a parish church and was owned successively by the Knights Templar and the Knights Hospitaller. Following the dissolution of the monasteries in the 16th century, ownership of the manor changed hands several times. From this point, the village also earned a reputation for ‘free thinkers’ as it attracted groups like Protestant dissenters who were forbidden to preach within the City.

⁴ NPPF (2023) Annex 2: Glossary (p.75)

- 3.8 Hampstead remained a rural settlement until the beginning of the 17th century when wealthy residents from London were attracted by its open land and clean water; it offered improved conditions outside of the crowded City following the plague of 1665 and then Great Fire of 1666. Growth was further spurred by the discovery of the medicinal qualities of chalybeate (mineral) waters found in natural springs around 1700, leading to the establishment of a popular pump room and spa. The spa's proximity to London also led to the construction of a number of large villas as well as more modest cottages for both permanent and temporary residents, although it would fall into decline in the 19th century due to competition with other fashionable London spas.
- 3.9 Hampstead's population continued to increase throughout the 18th century, resulting in expanding residential and townscape development; the area retains much of its street pattern from this period. As its popularity grew amongst wealthy residents, supported by the opening of the railway in the mid-19th century which made it easier to commute, this led to further development of a number of amenities, municipal buildings, hospitals and grand houses, many of which remain today. At the same time, a large area of open woodland which had historically belonged to the manor, today known as Hampstead Heath, came into public ownership to save it from development.
- 3.10 By the turn of the 20th century, Hampstead was considered a principal affluent suburb of London. A tradition of more Avant-garde architectural styles had been established in Hampstead in the 1870s, and this diversity of styles flourished throughout the area. This included a variety of Arts and Crafts style villas around Frogna! and Fitzjohns Avenue, changing to more traditional Neo-Georgian as the 20th century progressed. A number of Modernist style houses were built in the 1930s around Frogna! and in Willow Road, carrying on the tradition of nonconformity. Many of these were built for or later inhabited by well-known public figures, such as Sigmund Freud, reinforcing the reputation as an enclave for 'free thinkers'. Following WWII, there was a series of both private and public housing schemes throughout the area in varying styles, and by the 1970s the southern area of Hampstead became well-known for its collection of famous architect's houses. Smaller scale in-fill development has continued, with some encroachment by larger scale development in more recent years.
- 3.11 The Site is an example of infill development as it was built on a plot which historically formed part of the garden of the house to its north. Constructed in 1964, it is one of a pair of semi-detached Modernist style houses. Planning permission was granted to previous owners in 2021 for the total demolition of the existing house and the construction of a larger house on the Site, although this has not been implemented. The current owners are now pursuing a new series of alterations to the house that do not require its demolition, which are the subject of this assessment.

Character and Appearance

- 3.12 According to the Hampstead CA Statement (2001), the area contains a mix of factors which come together to create its special character, including its hilly topography; Hampstead Heath; the 'range, excellence and mix' of buildings; the historic street pattern; and the area's historical association with clean water and fresh air (p. 3). Whilst the predominant architectural style is large, late 19th century and early 20th century Victorian and Edwardian houses set in spacious, verdant gardens, there are also numerous examples of buildings reflecting a range of Avant-garde and non-traditional styles. This contributes to the area's overarching appearance as one of diverse architectural styles, made

cohesive by the high-quality design and materials used, with abundant foliage and green spaces interspersed amongst smaller private gardens, giving it a village character.

- 3.13 The CA is divided into eight 'Sub-Areas,' each of which features one or more 'Character Zones.' As such, it is considered that the character and appearance of the Hampstead CA is therefore derived from the wide range of areas within it, each of which makes an important and valuable contribution to the CA.
- 3.14 The Site is within Sub-Area 5: Frognal. Within this Sub-Area, properties range from earlier Victorian style to more contemporary Modernist designs, such as the Site itself. The east side of Frognal Gardens was built first in the 1880/90s and features several substantial red brick houses with stone dressings and gables in various designs, while the west side of the road has a very different character with a group of two-storey detached houses set well back from the road, which feature distinctive pantile roofs. The Site is located at a bend in the road which links Frognal to Church Row, gently sloping south and west, and is set back from the road with a front paved brick driveway. As a result, there is limited visibility of the Site.

Contribution of Site

- 3.15 The Site, 18A, was built in 1965 by architect John Sutherland-Hawes for himself and forms part of an asymmetric pair of three storey, semi-detached Modernist style houses (18B was built a year later by an unrelated architect). These feature elements typical of Modernist design, such as its asymmetry, ribbon windows with vertical design emphasis, and are composed of brown brick with sections of red painted spandrel panels. According to the CA Statement, the pair, including the Site, is considered to be a neutral contributor to the CA (p. 41).
- 3.16 Although the asymmetric design is an element of the houses' Modernist style, there is currently a lack of cohesion between the two with the contrasting vertical and horizontal elements, reducing visual harmony and detracting from the quality of the overall design. Likewise, the existing spandrel panels between windows are weathered and faded, indicating poor quality materials which detract from the overall appearance.
- 3.17 As such, the current Site makes no contribution to the character and appearance of the Hampstead CA it contribute to the significance of other heritage assets in its vicinity.

Summary of Significance

- 3.18 The Hampstead CA holds significance by representing the historic village of Hampstead, as it has evolved from rural agricultural settlement to city suburb. It derives its special character from its long history of residential and townscape developments of varying architectural styles, reflecting different artistic and cultural periods throughout history. This mix of characters is scattered over Hampstead's hills and linked by the greenery and green spaces growing between them, enclosing smaller areas of different characters and creating a larger area with the appearance of countryside despite being well-developed. It also holds significance for its associations with important cultural figures, including those associated with the discoveries of the area's natural springs, and the 'free thinkers' who found residence there.

4 Assessment of Proposals

- 4.1 The heritage legal and planning policy relevant to the consideration of the application proposals are set out in Appendix A of this report. This legal and policy context includes the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF as well as regional and local policy for the historic environment.
- 4.2 In accordance with paragraph 200 of the NPPF, the significance of the designated and non-designated heritage assets that may be affected by the application proposals have been set out in Section 3 of this report.
- 4.3 The NPPF requires local planning authorities to identify and assess significance of a heritage asset that may be affected by the proposals (paragraph 201). They should take the assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.
- 4.4 Account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability, and the desirability of the new development making a positive contribution to local character and distinctiveness (paragraph 196).
- 4.5 When considering the impact of proposals on the significance of designated heritage assets, the NPPF requires (paragraph 205) that great weight should be given to their conservation and the more important the asset, the greater the weight should be. This is consistent with recent high court judgements (Barnwell Manor, Forge Fields) where great weight should be attached to the statutory duty.
- 4.6 Where a development proposal causes harm to the significance of designated heritage assets, this should either be treated as less than substantial (paragraph 208), or substantial (paragraph 207). In determining the level of harm, the relative significance of the element affected should be taken into account (paragraph 205). Furthermore, local planning authorities are also encouraged to look for opportunities for new development within conservation areas and the setting of heritage assets to enhance or better reveal their significance. According to paragraph 212, proposals that preserve those elements of setting the make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.

The Proposals

- 4.7 The application proposals comprise:
- *Part single storey and part two storey rear extension;*
 - *Conversion of garage to habitable space including front extension and replacement of garage door with windows and cladding panels;*
 - *Zinc cladding to upper ground floor front window;*
 - *Side porch extension including addition of a rooflight and cladding material change from spandrel panel to zinc cladding;*

- *Replacement of existing windows with metal framed double-glazed units;*
- *Installation of photovoltaic solar panels and two rooflights on existing flat roof of the host property;*
- *Landscaping works to rear with associated alterations;*
- *Installation of Air Source Heat Pump external unit.*

Impact of Application Proposals

- 4.8 Despite having existing planning permission for the total demolition and rebuild of the house, the current owners have decided to renovate the existing building, keeping sustainability and good design at the forefront; as such, the existing building will be retained to eliminate the loss of fabric and reduce carbon costs. Moreover, they have taken this opportunity to enhance the appearance of a building which is currently considered to make only a neutral contribution to the CA, through the provision of high-quality design. Thus, the building will not only reflect “the diversity of architectural style and consistently high quality in design [which] makes Hampstead special,” but also extend its lifetime as a sustainable, practical modern home (Hampstead Conservation Area Design Guide, p. 3).
- 4.9 The proposals aim to renovate and extend the existing house to make it suitable for modern family living and to be as energy efficient as possible whilst paying due regard to the special interest of the Hampstead CA. The following proposals, including replacement works (windows and spandrel panels) and extensions (two storey rear extension, side porch, and front bay) have been designed to maintain the integrity of the existing building, especially in its relationship to 18B, and retain as much fabric as possible, whilst upgrading its sustainability and appearance.

Part single storey and part two storey rear extension

- 4.10 As stated in the pre-application response from the Council, a two-storey rear extension is acceptable in principle at the Site. It will extend from the rear of the building and be modest in size, such that its height and massing would be less than the main building and therefore be subservient in character. Additionally, it will match the depth of the existing two-storey rear structure on the adjoining house and be set back from the boundary between them and therefore be respectful of the amenity of the adjoining house and appropriate for the context.
- 4.11 The extension will also have the same angled flat roof as the main building and use the same type of materials and glazing proposed to be used throughout the renovated elements of the main house. This will create a cohesive appearance. Brickwork matching to the main building will be used at ground floor level and the zinc cladding at first floor level, whilst the glazing will follow the same geometry and pattern as other proposed replacement windows, reinforcing the Site’s Modernist design whilst also clearly demonstrating the modern and original areas of the building.
- 4.12 Due to the constraints of the Site’s plot, there is limited area where the existing house could be extended to provide additional habitable space for the current residents and their extended family. In addition to the conversion of the under-utilised garage, the additional habitable space provided by the rear extension will allow the house to be comfortable for its residents for a longer time, ensuring the Site’s long-term sustainability by adapting it for future generations and offering both short- and long-term benefits to its residents. Therefore, the rear extension is an example of sustainable

development as it is a proposal which has been carefully designed so that it responds to the existing Site, its adjoining building, and the Hampstead CA. The rear extension will not be visible from the street frontage or impact any views within, to or from the CA, and as such will preserve the special interest and significance of this designated heritage asset.

Conversion of garage to habitable space including front extension and replacement of garage door with windows and cladding panels

- 4.13 As mentioned above, due to the constraints of the Site’s plot, there is limited area where the existing house could be extended to provide additional habitable space. Therefore, in addition to the proposed rear extension, it is proposed to convert the under-utilised garage (currently used for storage as its size makes it unsuitable for parking contemporary cars) to habitable space. The garage is already connected internally to the main house and the level is directly accessible, thus it will provide much needed accessible accommodation for its current and future residents. In this way, like the proposed rear extension, the garage conversion is an example of sustainable development which adds much needed habitable space and extends its lifespan of usability.
- 4.14 The existing garage frontage is considered to detract from the overall appearance of the Site due to the faded and weathered spandrel panels. To enhance its appearance, it is proposed to cover the existing spandrel panels with zinc cladding. The cladding will better align with the existing brickwork and the subtle colour/pre-weathered patina will create a more harmonious, aesthetic blend with the proposed window frames and the original brickwork across both houses. Moreover, zinc cladding is not only a high-quality material with an improved aesthetic, it is also 100 percent recyclable and can be endlessly reused, further enhancing the sustainability of the whole Site by extending the lifespan of its materials whilst preserving historic fabric.
- 4.15 As part of the garage conversion, it is proposed to extend the front of the garage slightly and install new windows and the zinc cladding. These new elements will improve the appearance of the Site as a whole and enhance its Modernist design by simplifying the front elevation and reinforcing its verticality. These works will enhance the appearance of the Site, and not impact any views within, to or from the CA; as such these proposals will preserve the special interest and significance of this designated heritage asset.

Zinc cladding to upper ground floor window surround

- 4.16 Like the garage frontage, the spandrel panel forming the existing upper ground floor window surround is faded and weathered and detracts from the overall appearance of the Site. It is proposed to replace this with the same zinc cladding as proposed elsewhere. This new element will improve the appearance of the Site and serve as a cohesive part of its overall design, and will not impact any views within, to or from the CA; as such these proposals will preserve the special interest and significance of this designated heritage asset.

Side porch extension including addition of a rooflight and cladding material change from spandrel panel to zinc cladding

- 4.17 The existing side porch, which currently appears as a lean-to in form is presently considered to detract from the Site. As such, it is proposed to renovate and slightly extend the existing side porch, and

install the same zinc cladding with an entrance door in a matching material to create a more unified appearance across the building. A rooflight is proposed to the flat roof which will not be visible.

- 4.18 As the existing brickwork on the side elevation will be retained, there will be no impact on the main building. Whilst there is limited visibility of the side porch due to its positioning, the proposed size and massing of the side porch extension will also ensure it is subservient in character to the Site. As the proposed design will improve the overall appearance of the Site, and will not impact any views within, to or from the CA, it is considered to preserve the special interest and significance of this designated heritage asset.

Replacement of existing windows with metal framed double-glazed units

- 4.19 Currently, the existing windows, which are single-glazed with metal frames, have very poor thermal performance and have been fitted with secondary glazing which detracts from the appearance of the Site. The large expanses of glazing, which provide geometric interest integral to the Site's Modernist style, have a disordered arrangement and do not blend well with the existing brickwork, therefore replacing these with appropriately designed fenestration (in terms of arrangement, dimensions, and colours) in the form of double-glazed, metal framed windows will improve both the energy efficiency and appearance of the house. The proposed windows will create a more simplified composition, softening the geometry whilst blending better with the proposed zinc cladding, and enhancing its Modernist design. As the proposed design will improve the overall appearance of the Site, nor will it impact any views within, to or from the CA, it is considered to preserve the special interest and significance of this designated heritage asset.

Installation of photovoltaic solar panels and two rooflights on existing flat roof of the host property

- 4.20 It is proposed to install photovoltaic panels onto the flat roof of the existing main house. These would be positioned at 10 degrees (as recommended by Historic England guidance), keeping a nearly flat roof, and away from the roof edges so that the panels will not be visible from the street. There will be no impact on views within, to or from the CA and therefore these works will preserve the special interest and significance of this designated heritage asset.
- 4.21 It is also proposed to install two rooflights onto the flat roof of the existing main house. These will improve natural lighting throughout large areas of the house such that it will reduce the need for artificial lighting, thus improving energy efficiency. As the rooflights will not be visible from the street nor impact any views within, to or from the CA, the special interest and significance of this designated heritage asset will be preserved.

Landscaping works to rear with associated alterations

- 4.22 As set out in the arboriculture report, four low quality trees (T7 Magnolia, T8 Hazel, T9 Elder and T11 Privet) will be felled to enable the proposed works.
- 4.23 These will be replaced, and additional landscaping will be added around the Site, increasing the overall amount of greenery at the Site. This will enhance the appearance of the Site and ensure it remains in keeping with the surrounding area, which draws its special interest from the amount of greenery, foliage and planting throughout, thereby enhancing the special character of the CA overall.

Installation of Air Source Heat Pump external unit

- 4.24 It is proposed to install an air source heat pump (ASHP) behind the side porch extension. In addition to the installation of the aforementioned photovoltaic panels and double-glazed windows, the ASHP will help to reduce energy use and carbon emissions and improve the sustainability of the Site overall. The ASHP will not be visible from the street frontage or surrounding area due to its positioning, therefore it will not impact any views within, to or from the CA and the special interest and significance of this designated heritage asset will be preserved.

Impact on Hampstead Conservation Area

- 4.25 As stated above, the special character of the Hampstead CA is primarily derived from the “excellence and mix of buildings” within it (p. 3). The proposed development outlined here is considered to fit within the eclectic nature of the CA, itself reflective of a mixture of architectural periods and styles, and is of overall high quality, innovative design and materials.
- 4.26 Whilst paying regard to the special interest of the CA, the revised proposals consider how to improve the aesthetics of the Site (which is currently considered to make a neutral contribution to the CA), provide much needed additional habitable space, and improve the building’s sustainability credentials and long-term viability. The proposed replacement of the poor-quality windows and the weathered spandrel panels with sustainable zinc cladding and double-glazed windows have been selected to improve both the appearance and sustainability of the Site. The proposed side porch extension, rear extension, and extension of the garage frontage, are designed to be subservient in character to the main building whilst providing much needed additional habitable space. Moreover, the material composition of brickwork and zinc cladding, in a complementary colour, are together a modern interpretation of the surrounding red brick Victorian, Edwardian and Arts and Crafts style houses, many of which feature red tiled roofs, and decorative moulded brickwork or areas of tile hanging.
- 4.27 The proposals have also given due consideration to how to improve the Site’s relationship with the adjoining building, as it was designed as a composition rather than individual elements. Working within the existing brickwork will ensure that the relationship of between the two buildings is retained; and by adjusting the form slightly this will soften the geometry of the contrasting horizontal (18B) and vertical (18A) elements.
- 4.28 Thus, the proposals, in their entirety, are of a high-quality; appropriate in scale and form; and are considered to be an enhancement to the character and appearance of the CA through design which improves both the visual aesthetics and energy performance of a building which currently makes no meaningful contribution to the CA.

Considerations against Legislation and Policy

Statutory Duties

- 4.29 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the decision maker in determining applications for planning permission to have special regard to the desirability of preserving the character and appearance of conservation areas.

- 4.30 This statement has identified the significance of the designated heritage assets which could be affected by the application proposals and concludes that the special character and appearance of the Hampstead CA. As such, the application is in accordance with the statutory duties of the Act.

NPPF (2023)

- 4.31 The significance of the identified heritage assets (both designated and non-designated), as required by paragraph 200 of the NPPF, has been set out in Section 3 of this report. In accordance with paragraph 197 of the NPPF, the proposed development will preserve the character and appearance of the Hampstead CA.
- 4.32 The conservation of the heritage assets has, in line with paragraph 205 of the NPPF, been given great weight. The proposed development provides an opportunity for new development to better reveal the significance of the surrounding heritage assets (paragraph 206) and will have no impact on views into or out of the CA. Accordingly, the proposals will preserve the special interest of this designated heritage asset, and as such, the policy tests contained within paragraph 208 does not apply.

London Plan (2021)

- 4.33 This statement has demonstrated that the application proposals have sought to optimise the Site capacity through a design-led approach, based on a comprehensive understanding of the surrounding heritage sensitivities by identifying the heritage assets which could be affected by the proposed development and assessing their significance. As the proposed development preserves the heritage values of the surrounding area, it is therefore in accordance with Policy HC1 (Heritage Conservation and Growth) of the London Plan.

Camden Local Plan (Adopted 2017)

- 4.34 The high-quality design of the proposed development considers the local context, setting, and character and for development to integrate with the form and scale of surrounding buildings and is therefore in accordance with Policy D1 – Design. Additionally, as set out in this report, the proposed development is considered to preserve the character and appearance of the Hampstead CA and thus complies with Policy D2 – Heritage.

Hampstead Neighbourhood Plan (2018)

- 4.35 As required by Policy DH1: Design of the Hampstead Neighbourhood Plan, the development proposals demonstrate how they respond and contribute positively to the distinctiveness and history of Character Area 2 – Outer Village through their design and landscaping. As demonstrated by this assessment, the development proposals both respect and enhance the character and local context of the character area and the way it functions and are therefore in accordance with Policy DH1.
- 4.36 As required by Policy DH2: Conservation Areas and Listed Buildings, the development proposals are in accordance with guidelines set out by the Hampstead CA Statement and Management Strategies.

- 4.37 As required by Policy NE2: Trees, the justification for the proposed removal of three trees and details of replacement trees has been set out.

Hampstead Conservation Area Statement (2001)

- 4.38 This statement has demonstrated that the proposed rear extension will not alter the balance and harmony of the Site as its design is of sensitive scale and appropriate materials as required by Guideline H26. Moreover, there will be limited visibility of the rear extension and thus will not adversely affect the architectural integrity of the Site or the character of the CA.
- 4.39 This statement has demonstrated that the rear extension will be in harmony with the original form and character of the Site, as required by Policy H27.
- 4.40 This statement has demonstrated that whilst the proposed development will include the loss of several low-quality trees, it will incorporate new trees into the design such that it better contributes to the character and appearance of the CA as required by Policy H45. Additionally, the proposed landscape design is of high quality which respects the character and appearance of the CA and thus complies with Policy H46.

5 Conclusions

- 5.1 This Heritage Statement has been prepared to assess the impacts relating to the proposed development at 18A Frognal Gardens, London, NW3 6XA. The proposals comprise:
- *Part single storey and part two storey rear extension;*
 - *Conversion of garage to habitable space including front extension and replacement of garage door with windows and cladding panels;*
 - *Zinc cladding to upper ground floor front window;*
 - *Side porch extension including addition of a rooflight and cladding material change from spandrel panel to zinc cladding;*
 - *Replacement of existing windows with metal framed double-glazed units;*
 - *Installation of photovoltaic solar panels and two rooflights on existing flat roof of the host property;*
 - *Landscaping works to rear with associated alterations.*
- 5.2 The proposals have been designed following several rounds of feedback from the London Borough of Camden. As per paragraph 205 of the NPPF, great weight has been given to the preservation of the designated heritage asset – the Hampstead Conservation Area – which has been central in the design.
- 5.3 In accordance with the requirements of the NPPF 2023, the heritage assets that will be affected by the application proposals have been identified and their significance described. A clear understanding and appreciation of the significance of the heritage assets has informed the evolution of the proposals.
- 5.4 This report has concluded that the application proposals will preserve the character and appearance of the Hampstead Conservation Area.
- 5.5 The works are therefore in accordance with the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF (2023) and relevant regional and local policy and guidance, including the London Plan (2021) and the Camden Local Plan (2017).

Appendix A – Heritage and Planning Policy Context

Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from Section 16 of the 1990 Act which states that in considering applications for listed building consent, the local planning authority shall have special regard to the desirability of preserving the Listed Building or its setting or any features of special architectural or historic interest which it possesses.

Section 66 further states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

According to Section 69 of the Act a Conservation Area is an “area of special architectural or historic interest the character and the appearance of which is desirable to preserve or enhance”. It is the duty of Local Authorities to designate such areas and to use their legal powers to safeguard and enhance the special qualities of these areas within the framework of controlled and positive management of change.

Section 69 further states that it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly. Adding, The Secretary of State may from time to time determine that any part of a local planning authority’s area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

Further to this Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard to the desirability of preserving or enhancing the character and appearance of Conservation Areas. Further provisions are detailed in Section 74 of the Act.

Recent case law⁵ has confirmed that Parliament’s intention in enacting Section 66 (1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means “to do no harm”. This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy. This can also logically be applied to the statutory tests in respect of conservation areas. Similarly, it has also been proven that weight must also be given to heritage benefits.

⁵ Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) Historic England (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014

National Planning Policy

National Planning Policy Framework (NPPF) December 2023

The National Planning Policy Framework (NPPF) was published on the 20th of December 2023 and sets out the Government's planning policies for England and how these are expected to be applied. It has purposefully been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.

When determining Planning Applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the 'golden thread' which is expected to run through the plan-making and decision-taking activities. It should be noted, however, that this is expected to apply except where this conflicts with other policies combined within the NPPF, inclusive of those covering the protection of designated heritage assets, as set out in paragraph 11 of the NPPF. Within section 12 of the NPPF, 'Achieving well-designed and beautiful places', Paragraphs 131 to 141, reinforce the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high-quality places. This section of the NPPF affirms the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, reflecting the built identity of the surrounding area.

Section 16, 'Conserving and Enhancing the Historic Environment', Paragraphs 195- 214, relate to developments that have an effect upon the historic environment. These paragraphs provide the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. This should be a positive strategy for the conservation and enjoyment of the historic environment and should include heritage assets which are most at risk through neglect, decay or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance.

The NPPF advises local authorities to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment. These considerations should be taken into account when determining planning applications:

- The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;
- The wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;
- The desirability of new development in making a positive contribution to local character and distinctiveness;
- Opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 197 of the NPPF states that when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or

historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

In order to determine applications for development, Paragraph 200 of the NPPF states that LPAs should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting. Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.

According to Paragraph 201, LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

Paragraphs 205 to 214 consider the impact of a proposed development upon the significance of a heritage asset. Paragraph 205 emphasises that when a new development is proposed, great weight should be given to the asset's conservation and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.

Paragraph 208 advises that where a development will cause 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 securing its optimum viable use.

In addition, Paragraph 212 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Adding, proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

Paragraph 213 importantly clarifies that not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Adding, loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The NPPF therefore continues the philosophy of that upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative and sustainable approaches to managing change. English Heritage (now Historic England) defined this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment.' (Constructive Conservation in Practice, English Heritage, 2009).

National Guidance

Planning Practice Guidance (PPG) 2019

Planning Practice Guidance (PPG) was introduced by the Government as a web-based resource on 6th March 2014 and is updated regularly, with the most recent update on 23rd July 2019. The PPG is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also states, conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.

Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available.

Key elements of the guidance relate to assessing harm. It states, an important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Adding, it is the degree of harm, rather than the scale of development that is to be assessed. The level of 'substantial harm' is stated to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF.

Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

The PPG makes clear that the delivery of development within the setting of heritage assets has the potential to make a positive contribution to, or better reveal, the significance of that asset.

Finally, the PPG provides in depth guidance on the importance of World Heritage Sites, why they are important and the contribution setting makes to their Outstanding Universal Value. The PPG also provides guidance on the approaches that should be taken to assess the impact of development on the Outstanding Universal Value of World Heritage Sites.

Historic England Guidance - Overview

On the 25th March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide. This

document has been replaced with three Good Practice Advice in Planning Notes (GPAs), 'GPA1: Local Plan Making' (Published 25th March 2015), 'GPA2: Managing significance in Decision-Taking in the historic Environment' (Published 27th March 2015) and 'GPA3: The Setting of Heritage Assets (December 2017).

The GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on the how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

In addition to these documents, Historic England has published several core Advice Notes (HEAs) which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; 'HEAN1: Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)', 'HEAN2: Making Changes to Heritage Assets' (25th February 2016) and 'HEAN3: The Historic Environment and Site Allocations in Local Plans' (30th October 2015). In addition to these 'HEAN4: Tall Buildings' (March 2022), 'HEAN7: Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021), 'HEAN10: Listed Buildings and Curtilage' (21st February 2018), 'HEAN12: Statements of Heritage Significance' (October 2019), and HEAN13. Collectively, these Advice Notes provide further information and guidance in respect of managing the historic environment and development within it.

Historic England Good Practice Advice Note 1 (GPA1): The Historic Environment in Local Plans (March 2015)

This document stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence in relation to the economic, social and environmental characteristics and prospects of an area, including the historic environment, as set out by the NPPF. The document provides advice on how information in respect of the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance). This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

Furthermore, the Local Plan can assist in ensuring that site allocations avoid harming the significance of heritage assets and their settings, whilst providing the opportunity to 'inform the nature of allocations so development responds and reflects local character'.

Further information is given relating to cumulative impact, 106 agreements, stating 'to support the delivery of the Plan's heritage strategy it may be considered appropriate to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk.' It also advises on how the heritage policies within Local Plans should identify areas that are appropriate for development as well as defining specific Development Management Policies for the historic environment. It also suggests that a heritage Supplementary Planning Document (SPD) can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.

Historic England Good Practice Advice Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-taking in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that ‘development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.’

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of development proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary. This document also provides guidance in respect of neglect and unauthorised works.

Historic England Good Practice Advice Note (GPA3): The Setting of Heritage Assets (December 2017)

This is used to understand the surroundings of a heritage asset which may contribute to its significance. It aids practitioners with the implementation of national policies and guidance relating to the historic environment found within the NPPF and PPG, once again advocating a stepped approach to assessment.

It amalgamates 'Seeing the History in the View' (2011) and 'Setting of Heritage Assets' (2015) forming one succinct document which focuses on the management of change within the setting of heritage assets.

The guidance is largely a continuation of the philosophy and approach of the previous documents, albeit now with a greater emphasis on the contribution that views to and from heritage assets make to their significance. It reaffirms that setting should be understood as the way in which an asset is experienced.

The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors including noise, vibration and odour, while setting may also incorporate perceptual and associational attributes pertaining to the asset's surroundings.

This document provides guidance on practical and proportionate decision making with regards to the management of proposed development and the setting of heritage assets. It identifies that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, as well as further weighing up the potential public benefits associated with the proposals. It clarifies that changes within the setting of a heritage asset may have positive or neutral effects.

It highlights that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting and that different heritage assets may have different abilities to accommodate change within their settings without harming the significance of the asset and therefore setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, noting that any approach should be demonstrably compliant with legislation, national policies and objectives, Historic England recommend using a '5-step process' in order to assess the potential impact of a proposed development on the setting and significance of a heritage asset, with this 5-step process similar to that utilised in earlier guidance:

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

Historic England Advice Note 1 (HEA1): Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)

First published by English Heritage March 2011 as: Understanding Place: Conservation Area Designation,

Appraisal and Management and republished as Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1 2016, Historic England Advice Note 1 (HEA): Conservation Area Appraisal, Designation and Management (Second Edition, February 2019) continues to support the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management.

This second edition updates the advice in light of the publication of the 2018 National Planning Policy Framework and gives more information on the relationship with local and neighbourhood plans and policies. It is also re-ordered, to underline the staged approach to the appraisal, designation and management of conservation areas, while continuing to offer advice on managing conservation areas so that the potential of historic areas worthy of protection is fully realised. It has also been updated to give more information on innovative ways of handling conservation appraisals, particularly community involvement beyond consultation, character assessment and digital presentation.

This document identifies different types of special architectural and historic interest which contribute to the significance and character of a conservation area, leading to its designation. These include:

- Areas with a high number of nationally designated heritage assets and a variety of architectural styles and historic associations;
- Those linked to a particular industry or individual with a particular local interest;
- Where an earlier, historically significant, layout is visible in the modern street pattern; Where a particular style of architecture or traditional building materials predominate; and
- Areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of parks and gardens of special historic interest.

Change is inevitable, and often beneficial, and this document provides guidance in respect of managing change in a way that conserves and enhances conservation areas. It also identifies ways in which suitable areas can be identified for designation as new conservation areas or extensions to conservation areas through historic characterisation studies, production of neighbourhood plans, confirmation of special interest and setting out of recommendations.

Historic England Advice Note 7 (HEA7): Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021)

First published by English Heritage in 2012 under the title 'Good Practice Guide for Local Heritage Listing', HEA7: Local Heritage Listing: Identifying and Conserving Local Heritage supersedes the first edition of the published guidance; Historic England Advice Note 7: Local Heritage Listing (2016), reflecting the changes made to the Planning Practice Guidance in 2019.

The updated advice seeks to support communities and local authorities in the introduction of a local heritage list in their area or for those wishing to make changes to an existing list which may have already been adopted. It observes the value of a local heritage list and seeks to adopt a consistent and accountable approach to the identification and management of heritage assets at a local level.

Historic England notes that inclusion on a local heritage list based on sound evidence and criteria delivers a consistent and accountable way of recognising non-designated heritage assets, no matter how they are identified, to the benefits of good planning for the area and of owners, developers and others wishing to understand local context fully. By providing clear and up-to-date information, backed by policy set out in the NPPF (2023), a local heritage list which has been available on the website of a local planning authority and via the Historic Environment Record (HER) provides clarity on the location and identification of non-designated heritage assets.

Regarding the identification of non-designated heritage assets, Historic England builds on the guidance set out in Planning Practice Guidance (2019) in defining a non-designated heritage asset, highlighting that they can be identified in several ways, including:

- Local Heritage Lists;
- Local and Neighbourhood Plans;
- Conservation Area Appraisals and Reviews;
- Decision-making on planning applications.

Whilst the advice notes that planning protections for non-designated heritage assets are not as strong as those for designated heritage assets, it highlights that they are still important, referring to the importance of paragraph 209 of the NPPF (2023), which requires local planning authorities to take into account the desirability of sustaining and enhancing the significance of such heritage assets.

This document draws on good practice across the country in developing a new local heritage list or making improvements to an existing one. Importantly, this advice should be seen as a starting point. In order to remain flexible enough to respond to local needs, decisions on the ways in which assets are identified, and the system adopted for managing the local heritage list, are matters for local planning authorities and their communities. This advice does, however, set out methods for setting up and managing a local list to provide ideas on how this might be done, including providing a clear criterion setting commonly applied selection criteria for assessing the suitability of assets for inclusion in a local heritage list.

Historic England Advice Note 12 (HEA12): Statements of Heritage Significance (October 2019)

HEA12: Statements of Heritage Significance covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets.

The document states that understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions. It explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

Conservation Principles, Policies and Guidance (English Heritage, 2008)

Conservation Principles outlines English Heritage's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in English Heritage's own advice and guidance

through the planning process, the document is commended to local authorities to ensure that all decisions about change affecting the historic environment are informed and sustainable.

This document was published in line with the philosophy of PPS5 and is currently in the process of being updated. Nevertheless, it remains relevant to the current policy regime in that emphasis is placed upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main 'heritage values' being: evidential, historical, aesthetic and communal. The Principles emphasise that 'considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment' (paragraph 25).

Strategic Policy

The London Plan 2021

The new London Plan was adopted in March 2021. The Plan forms part of the strategic Development Plan and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It replaces all previous versions of the London Plan.

The concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, underpins the new London Plan 2021, ensuring that it is focused on 'sustainable development' for future generations.

Chapter 7 of the Plan sets out the relevant policies concerning development within the historic environment, stating that the built environment, combined with its historic landscapes, provides a unique sense of place within the city, whilst layers of architectural history provide an environment that is of local, national and international value. The Plan seeks to identify and promote sensitive management of London's heritage assets, in tandem with the promotion of the highest standards of architecture, maintaining the blend of old and new that contributes to the city's unique character.

Policy HC1: Heritage Conservation and Growth states:

- A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant 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:
 - a. setting out a clear vision that recognises and embeds the role of heritage in place-making
 - b. utilising the heritage significance of a site or area in the planning and design process

- c. 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
 - d. delivering positive benefits that 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.
- C. 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 avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Essentially the London Plan 2021 seeks to celebrate London's rich history, ensuring the character of an area underpins how it will grow and develop in the future. The Plan encourages the enhancement of the historic environment and looks favourably upon proposals which seek to maintain the significance and setting of the city's heritage assets.

Local Policy

Camden Local Plan (2017)

Camden's Local Plan was adopted by Council on 3 July 2017. It replaced the Core Strategy and Camden Development Policies. The Local Plan highlights the rich architectural heritage throughout the area and places great importance on preserving the historic environment, with an expectation that developments will not only conserve, but take opportunities to enhance, or better reveal the significance of heritage assets and their settings.

Policy D1 Design states the Council will seek to secure high quality design in development by requiring that the design of new development respects local context and character comprises of details and materials that are of high quality and complement the local character, and preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage.

Policy D2 Heritage states the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. To achieve this, the Council will not permit development that

results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweighs the harm.

Conservation Areas are also highlighted within Policy D2, noting development within conservation areas should preserve the character and appearance or enhance where possible.