



MAY 2025

Space House, 1 Kemble St, London WC2B 4AN

Heritage Statement

Iceni Projects Limited on behalf of
Thirdway

May 2025

ICENI PROJECTS LIMITED
ON BEHALF OF THIRDWAY

Iceni Projects

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Glasgow: 177 West George Street, Glasgow G2 2LB

Manchester: This is The Space, 68 Quay Street, Manchester, M3 3E

t: 020 3640 8508 | w: iceniprojects.com | e: mail@iceniprojects.com

linkedin: linkedin.com/company/iceni-projects | twitter: @iceniprojects

Space House, 1 Kemble St, London
WC2B 4AN
HERITAGE STATEMENT

CONTENTS

1. INTRODUCTION	1
2. RELEVANT LEGISLATION, POLICY, AND GUIDANCE.....	2
3. HISTORIC DEVELOPMENT OF THE SITE AND SURROUNDINGS	5
4. ASSESSMENT OF SIGNIFICANCE	8
5. ASSESSMENT OF EFFECTS	12
6. CONCLUSION	17

APPENDICES

A1. METHODOLOGY

1. INTRODUCTION

1.1 This Heritage Statement has been prepared by Iceni Projects in support of planning permission and Listed Building Consent at Space House, (Grade II, List UID: 1030185) located within the London Borough of Camden. It provides an assessment of the significance of the heritage asset and the anticipated effects of the proposals on the special interest listed building.

1.2 The scheme can be summarised as a light-touch internal fit-out of part of the second floor, including new partitions, kitchen points, flooring, joinery, and services. All changes are non-structural, fully reversible, and designed to avoid harm to the historic fabric. The works will support a modern office use while respecting the listed building's present character.

1.3 Specifically, this report will:

- Set out the relevant legislative and policy framework within which to understand the proposed development of the Site;
- Provide a proportionate and robust analysis of the Site and surrounding area's historic development;
- Describe the significance of the Site and the changes proposed.
- Provide an assessment of the potential effects to the significance of the heritage asset resulting from the proposed development.

1.4 The report is produced by Iceni Projects. Specifically, it is authored by: Edward Wollaston – Senior Consultant and Rebecca Mason, Associate Director. Review has been provided by Laurie Handcock, Director - Built Heritage & Townscape Team.

Scope of Assessment

1.5 Space House (Grade II, List Entry No. 1421847) is located within the Kingsway Conservation Area. The scope of the proposals is limited to internal alterations only, including the creation of new meeting rooms, lighting upgrades, and general refurbishment within a defined portion of the building. As the works do not affect the exterior of the building or its contribution to the wider conservation area, this assessment focuses on the significance of the listed building. This proportionate approach is consistent with Paragraph 207 of the National Planning Policy Framework (NPPF), which states that *"the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance"*.

2. RELEVANT LEGISLATION, POLICY, AND GUIDANCE

Legislation

- 2.1 Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
- 2.2 Primary legislation under Section 16 (2) of the Planning (Listed Buildings and Conservation Areas Act) 1990 requires that special regard be given to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest it possesses.

National Planning Policy Framework (December 2024)

- 2.3 The NPPF affirms, in paragraph 135, the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, while not preventing or discouraging appropriate optimisation, innovation or change (such as increased densities).
- 2.4 Paragraph 139 requires development that is not well-design to be refused, whilst significant weight should be given to development which reflects local design policies and/or is outstanding, innovative and helps raise the design standards in the area.
- 2.5 Paragraph 207 states that local planning authorities should require applicants to describe the significance of heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset.
- 2.6 Paragraph 210 emphasises that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- 2.7 Paragraphs 212 - 215 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), great weight should be applied to the statutory duty where it arises, and any harm to significance should require a clear and convincing justification. Where substantial or less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including for less than substantial harm, securing its optimum viable use (para.208). In the case of substantial harm, this must be necessary to achieve substantial public benefits, or a number of criteria set out in paragraph 207 apply.

- 2.8 Paragraph 219 encourages opportunities for new development within, and within the setting of, Conservation Areas and World Heritage Sites, to enhance or better reveal their significance. Whereas paragraph 210 notes that loss of an element which makes a positive contribution to these should be assessed according to paragraphs 214 and 215, taking into account its contribution to the whole.

Local Development Plan

- 2.9 The Local Plan for the London Borough of Camden is formed of the Camden Local Plan (adopted 2017), which sets out the overarching planning framework for the borough, including policies for design, heritage, sustainability, and land use. It forms part of the statutory development plan alongside the London Plan (2021) and relevant supplementary planning guidance.

Policy Document	Relevant Policy	Summary
Camden Local Plan (2017)	Policy D1 - Design	This policy requires new development (among many other factors): to be of the highest standard in terms of materiality and detailing; to respond to local character, and to make a positive contribution to streetscape; including creating attractive, functional and clearly defined public and private space.
	Policy D2 - Heritage	This policy reflects the NPPF, in that it seeks to ensure that schemes preserve (and where possible enhance) the significance of heritage assets, particularly recognising the weight to be given to designated heritage assets.
London Plan (2021)	Policy D3: Optimising site capacity through a design-led approach	Policy D3 requires that 'all development must make the best use of land by following a design-led approach that optimises the capacity of sites...[Meaning] ensuring that development is of the most appropriate form and land use for the site'. This includes: enhancing local context by positively responding to local distinctiveness through layout, orientation, scale,

		appearance and shape; providing active frontages, and responding to the existing character of a place.
	Policy HC1: Heritage conservation and growth	<p>This policy requires boroughs to develop evidence that demonstrates a clear understanding of London's historic environment. It further requires Boroughs to use this knowledge to inform the effective integration of London's heritage in regenerative change. Part C states:</p> <p>"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".</p>

3. HISTORIC DEVELOPMENT OF THE SITE AND SURROUNDINGS

- 3.1 Space House replaced an Edwardian building that had occupied the site 'Magnet House' and was constructed between 1964 and 1968 for the developer Harry Hyams, as part of his broader vision for high-quality speculative office development in central London during the post-war period. The complex was designed by George Marsh, a senior partner at the influential architectural firm Richard Seifert & Partners, known for their pioneering contributions to modern commercial architecture in the mid-20th century. Marsh was also responsible for the iconic Centre Point, which bears clear formal and structural similarities to Space House.
- 3.2 The development consists of two interconnected buildings: a 16-storey cylindrical tower and an eight-storey rectangular block fronting Kingsway, formerly known as Civil Aviation Authority (CAA) House. and was conceived as part of a broader urban vision for the area, including improved access to light and air for surrounding streets and buildings. The cylindrical form of the tower was a deliberate innovation to minimise overshadowing of adjacent properties—an unusual but effective response to urban density and planning challenges of the time. The building's structural system was equally innovative, relying heavily on precast concrete technology. A grid of cruciform precast concrete elements, assembled without traditional scaffolding, formed the primary construction method. This modular approach allowed for accelerated construction and lower labour costs, while simultaneously expressing the building's structure externally, which later becomes a popular architectural device prevalent across London and was pioneered in its use in this building. This creates a striking façade of exposed white concrete arranged in a regularised orthogonal grid, an example of the precast interlocking concrete was shown in the local press in Figure 4. At ground level, Y-shaped pilotis are similar to those at Centre Point and provide some visual and structural lightness which is characteristic of the Seifert & Partners aesthetic of structural expressionism. Internally, while the building was conceived with flexible floorplates suitable for a range of commercial uses, the internal finishes and layouts have evolved over time in response to changing occupational and ongoing use. The internal spaces were designed with a degree of embedded flexibility to changing office and commercial habits.
- 3.3 Upon completion in 1968, the complex remained vacant for several years and was not occupied until 1975, when it was leased to the Civil Aviation Authority, who remained a long-term tenant until 2022. The initial delay in occupation was not uncommon for Hyams' developments, which were often built as long-term investments rather than for immediate lease.
- 3.4 The building underwent significant refurbishment in 1996 and 2003, adapting the internal layout and decorative treatment for modern office use while largely retaining the exterior form and materials. Space House as a Grade II listed building in January 2015. Since its listing, further proposals for refurbishment have been approved. In November 2019, planning permission and listed building

consent were granted for a comprehensive refurbishment scheme by Squire and Partners, which sought to upgrade the building to contemporary standards while respecting and enhancing its architectural character.



Figure 1 – Exterior Shot RIBA Archive 1964



Figure 2 - District Bank Interior 1967 RIBA Archives

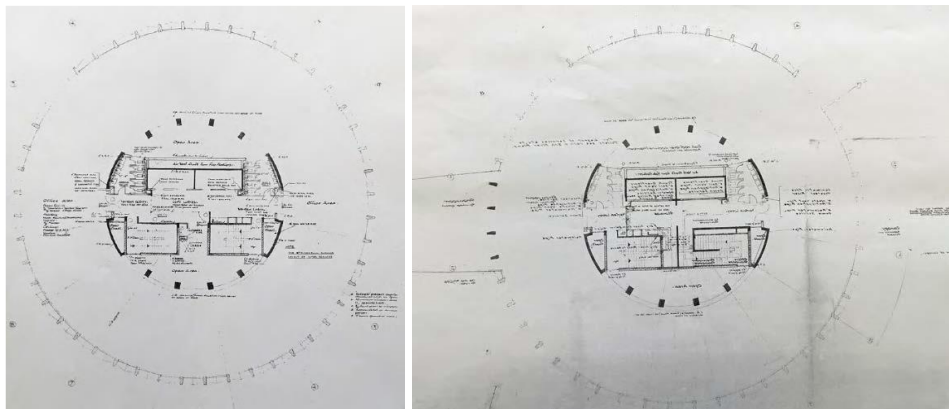


Figure 3 – 1964 Floor Plans RIBA Archives

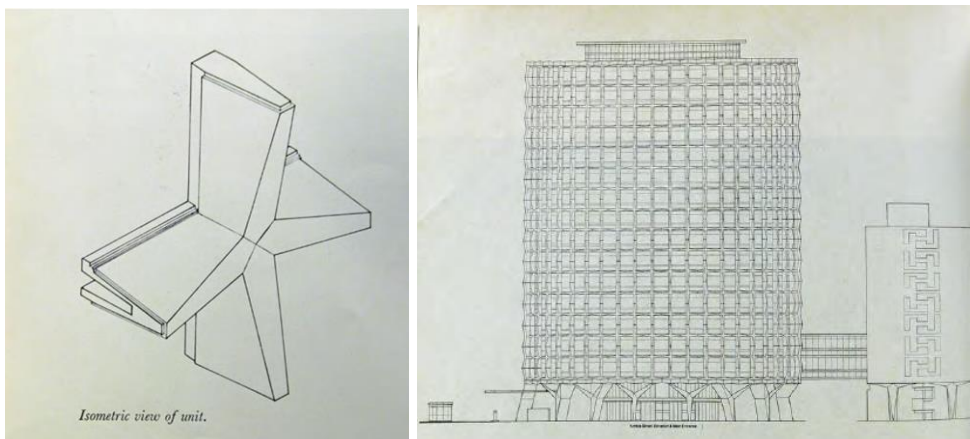


Figure 4 – Isometric View of Unit, Concrete Quarterly 1967, Space House South Elevation, 1968

4. ASSESSMENT OF SIGNIFICANCE

Assessment methodology

- 4.1 The assessment methodology used here for assessing the significance of the identified heritage assets and their settings is the framework set out in the November 2017 consultation draft of Historic England's best-practice guidance document *Conservation Principles*.¹ This proposes the use of three heritage interests – historical, archaeological, and architectural and artistic - in assessing what makes a place and its wider context special. These are broadly in line with the values – evidential [now archaeological], historical, aesthetic [now architectural and artistic], and communal [now part of historical] – set out in the previous, 2008 version,² but are consistent with the heritage interests in the NPPF, the definitions for which are now included in the updated Planning Practice Guidance:

archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

¹ <https://historicengland.org.uk/content/docs/guidance/conservation-principles-consultation-draft-pdf/>

² <https://content.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespoliciesguidanceapr08web.pdf/>

Space House (Grade II)

- 4.2 The Significance of Space House is principally derived from its status as an exemplar of 1960s British modernist architecture and the innovative methods used in its construction. Its design reflects the era's architectural experimentation, particularly in the use of precast concrete and modular construction. The building's distinctive cylindrical tower and the integration of structural and aesthetic elements demonstrate a high level of architectural ambition and technical proficiency. The building is also significant for its association with Richard Seifert & Partners, a firm instrumental in shaping London's post-war skyline. Space House, alongside projects like Centre Point and Tower 42, exemplifies the firm's impact on the city's architectural development.
- 4.3 The Listing description records the *Reasons for Designation* as; “*Space House, an office development of 1964-8 by George Marsh of Richard Seifert & Partners for the developer Harry Hyams, is listed at Grade II for the following principal reasons:*
- *Architectural interest: as one of London's best speculative office buildings, whose arresting yet subtly-handled exteriors reflect many of the 'Pop' themes at play in the contemporary Centre Point development;*
 - *Technical interest: for the innovative use of a precast concrete grid, a form of partial prefabrication that allowed for rapid construction without the use of scaffolding, as well as for striking visual effects;*
 - *Historic interest: as an icon of the 1960s commercial property boom, built by the most successful developer-architect partnership of the day, its assertive styling reflecting the confidence and dynamism associated with the period.”*

Interiors

- 4.4 The interiors of both the Kingsway block and the tower block at Space House have been substantially altered through successive modern refurbishments. The Kingsway block originally featured open-plan office spaces, but many of these have been subdivided with modern partitions. While the foyer was extensively refurbished in 1996, some original black marble panels with inscriptions remain, as does the open mosaic stair — though this has been visually compromised by later glazed enclosures. Secondary staircases, doors, and aluminium-framed windows remain largely original, but overall, the interiors have been modernised to a degree that they are considered to be of no heritage significance.
- 4.5 Similarly, in the tower block, the principal entrance lobby and office floors have been comprehensively refurbished with contemporary finishes, suspended ceilings, and internal fittings that are not of heritage interest. However, a small number of original features do survive, including a secondary stair in white mosaic and terrazzo, and two secondary stairs extending from the first to

fourteenth floor. These surviving elements are of limited interest, but do not constitute substantial contributors to the building's overall significance. These details are not located on the Second Floor where the proposals are located and would be unimpacted by the changes proposed.

- 4.6 Basement and sub-basement areas, as well as ventilation systems, have also been altered and partially obscured by late-20th-century interventions. These areas are also assessed to be of no significance due to the extent of alteration.

Summary of Special Interest

Architectural Interest

- 4.7 Space House is recognised as one of London's most distinguished speculative office developments of the 1960s. Its striking external design features precast concrete grids, with the tower's sculptural form and the slab block's granite-clad elevations reflecting the 'Pop' architectural themes contemporaneous with the Centre Point development. The building's innovative use of precast cruciform concrete units allowed for rapid construction without scaffolding, showcasing a significant advancement in building technology of the era.
- 4.8 The construction of Space House employed a combination of in-situ concrete and a structural outer grid of precast units, facilitating rapid assembly and contributing to the building's distinctive aesthetic. The tower's polished white concrete façade and Y-shaped pilotis not only provide structural support but also serve as a visual statement, enhancing the building's sculptural quality.

Historic Interest

- 4.9 The building stands as an emblem of the 1960s commercial property boom, embodying the confidence and dynamism of the period. Developed by the prominent partnership of Harry Hyams and architect Richard Seifert, Space House exemplifies the era's speculative office architecture and reflects the broader trends in urban development and architectural design during that time.

Setting

- 4.10 Situated within the Kingsway Conservation Area, Space House contributes to the architectural diversity and historical narrative of the locale. Its design responds to urban planning considerations of the time, such as maximising natural light and minimizing the building's shadow impact on surrounding buildings. Space House is prominently located at the junction of Kemble Street and Kingsway in central London, within the Kingsway Conservation Area in the London Borough of Camden. The area is defined by its broad, formal boulevards and a mix of Edwardian and mid-20th-century commercial architecture. Kingsway itself was conceived in the early 20th century as a grand civic thoroughfare, characterised by wide pavements, formal building lines, and large-scale office and institutional buildings.

- 4.11 The setting of Space House is distinctly urban, with its immediate context comprising a mix of historic and modern developments. To the east, the building faces Kingsway and its largely Edwardian and interwar stone-clad commercial blocks, which contribute to the formal, institutional character of the conservation area. To the west and south, the setting transitions into a finer urban grain, with smaller-scale buildings, rear service areas, and more varied architectural styles. rounding structures.

5. ASSESSMENT OF EFFECTS

Proposed Development

- 5.1 This following section should be read in conjunction with the drawings produced by Thirdway and planning statement accompanying this application.
- 5.2 The Proposed Development comprises a series of minor internal alterations within a defined portion of Space House. These works are limited in nature and do not involve changes to the external appearance, structure, or wider site context. The works are designed to be sensitive to and will allow the Introduction of new meeting rooms, improvements to internal lighting and general refurbishment and decorating works. The works are contained to the 2nd floor.

Walls and Partitions

- New glass and plasterboard walls to divide spaces, fixed carefully to avoid damage to the original structure.
- Some walls will be movable (operable) and built into overhead support structures.
- Decorative timber slat partitions and standard partition walls will be securely fixed from floor to ceiling.

Floors

- A levelling layer will be added across the floor.
- Vinyl and carpet flooring will be laid on top, depending on the room type.
- All floor finishes are glued down but removable in the future.

Kitchen and Joinery

- Three kitchen points will be added:
 - Two with plumbing above the ceiling.
 - One with plumbing running along the walls.
- Two dry kitchen points (no water) will include fridges and shelves.
- A central island unit will be added (no plumbing), with hidden electrical wiring.
- A new reception desk will be installed around existing columns.
- A workbench and seating booths will be fixed in place.

Services

- New air conditioning units will be added. Pipes will run through existing routes to the roof.
- Lighting will be updated to match the new layout, using existing cable paths.
- Wall lights will be added to columns.
- New power outlets in the floor will be installed in meeting rooms.
- A ceiling-mounted projector and curtain tracks will be fixed using small, non-intrusive fittings.

5.3 Finishes

- All main walls will be repainted with two coats of emulsion.

5.4 All works are within areas previously subject to change and refurbishment as part of the consented 2019 scheme, and represent minor alterations to suitably accommodate new incoming occupiers. They will follow the landlord's fit-out guide and ensure the original building character is preserved.

Effects on the Significance of the Listed Building

Introduction of Meeting Rooms

- 5.5 The formation of new meeting rooms will result in localised changes to the internal plan. These are confined to areas that have already been heavily modernised and do not contain surviving features of historic or architectural interest. These changes are wholly inkeeping with the original design intent of the building as flexible offices, designed as adaptable workspaces and an open-plan office environment designed to suit occupier needs. The ability to subdivide spaces and provide adaptable floor space, being a core tenant of the building's origin design ethos.
- 5.6 The introduction of partitions would be fully reversible and respect the character of the existing fit-out. There is no loss of historic fabric, and the works would be sympathetic to the original flexible design intent.
- 5.7 The change would not amount to any harm to the special interest of the building; the change would be reversible and sympathetic in layout and detailing and consistent with the building's use and prior interventions.

Internal Lighting Alterations

- 5.8 The proposed lighting upgrades will improve energy efficiency and usability. The works are compatible with the 2019 refurbishment and will enhance user experience, supporting the building's sustainable, ongoing use.

General Refurbishment

- 5.9 Refurbishment works are confined to previously altered areas with limited or no original features. The upgrades will improve the condition and functionality of these spaces while respecting the building's internal aesthetic.

Walls and Partitions

- 5.10 New partitions, including glass, plasterboard, and timber slats, will reconfigure internal spaces. Operable walls will be supported overhead, and all works will be integrated carefully to suit the existing interior. No impact is expected beyond improving layout flexibility and usability.

Floors

- 5.11 A levelling layer will be applied across the floor, with new vinyl and carpet finishes laid depending on room function. All finishes are reversible, with no long-term alteration to the underlying structure.

Kitchen and Joinery

- 5.12 New kitchen points, a central island unit, reception desk, seating booths, and other joinery will be added to improve function and layout. Plumbing and electrical services will follow existing routes or surface-mounted where appropriate.

Services

- 5.13 Upgraded air conditioning, lighting, power, and AV installations will be integrated using existing or non-intrusive services routes. These works support modern use without altering the building's character.

Finishes

- 5.14 Walls will be repainted, and all works will comply with the landlord's fit-out guide. The overall approach ensures compatibility with the building's existing design and finishes and would be entirely in character with the internal treatment. Refurbishment works are confined to areas which have already been previously decorated and subject to significant alteration, they do not contain any features of architectural or historic interest. These spaces reflect past fit-outs and not the original decorative treatment. The proposed upgrades are fully in line with the building's original design principles, which emphasised flexibility, modularity, and adaptability. The building was conceived as an open-plan office environment, designed around a rational structural grid and service infrastructure that would allow for internal spaces to be easily reconfigured to meet evolving occupational needs.
- 5.15 The refurbishment will enhance the condition, coherence, and usability of these areas through the introduction of high-quality but neutral finishes that respect the building's established internal language and allow for future adaptability. Works will include refreshed surfaces, updated fittings, and new internal treatments that reinforce the clear, modernist character of the interiors.
- 5.16 These interventions are non-invasive and fully reversible and will be undertaken in accordance with the landlord's fit-out guide to ensure compatibility with the listed building. In this way, the refurbishment supports the building's long-term, sustainable use while remaining entirely consistent with its architectural significance and the intentions of its original design.

Summary of Effects

- 5.17 The proposed fit-out will have no adverse impact on the significance of the listed building. All works are confined to internally altered, modern areas on the Second Floor and do not involve the removal or alteration of any original historic fabric. Interventions are non-structural, fully reversible, and carefully designed to respect the building's character, while improving functionality and appearance in line with its original design intent.

- 5.18 The building was conceived and constructed as a modern, open-plan office space, with a structural and servicing strategy that enabled flexibility and adaptability across its internal floorplates. This approach was a defining aspect of its architectural and functional design. The proposed works maintain this by introducing a high-quality, flexible fit-out that allows for future reconfiguration without intrusive or permanent alteration.
- 5.19 Layouts and service upgrades would avoid any damage to original structure or finishes, following the landlord's heritage-compliant fit-out guide to ensure coherence with existing treatments. The internal works retain the integrity of the open-plan arrangement, reinforce legibility of circulation, and complement the visual language established in previous refurbishment phases.
- 5.20 There is therefore no harm to the special architectural or historic interest of the building, nor to its contribution to the Weybridge Town Centre Conservation Area. The proposals uphold the building's original principles of adaptability, clarity, and functional design, while enhancing its usability and performance.
- 5.21 As no harm arises, the heritage policy tests set out in Paragraphs 212-215 of the National Planning Policy Framework (NPPF, 20243) are not applied. The proposals support the long-term, sustainable use of the building and are fully consistent with national and local objectives to conserve and enhance the historic environment.

6. CONCLUSION

- 6.1 This Heritage Statement provides a proportionate assessment of the significance of Space House and considers the effect of the proposed works on its special interest. The assessment concludes that the proposed works would not give rise to any harmful effects.
- 6.2 Space House is designated at Grade II for its special architectural and historic interest, particularly in relation to its distinctive elevations, innovative use of precast concrete construction, and its significance as a landmark of post-war office development. The internal portion of the building affected by the proposals has been subject to substantial prior alteration and has a high tolerance for change. The internal fabric within this area is not of heritage value and does not contribute meaningfully to the building's significance. The proposed works will deliver a high-quality renovation of part of the interior, these changes will be sympathetic to the building's existing internal character, preserving the overall spatial experience while enhancing functionality and updating the aesthetic in a contemporary and appropriate manner. The proposed reconfiguration of the internal layout will maintain, and in some respects improve, the character of the interior. As such, the special interest of the listed building will be preserved. The design proposals have been developed with expert heritage input, they are sympathetic to the architectural qualities of the building and do not result in harm to the building key components of its special interest.
- 6.3 In conclusion, the proposed internal works will support the ongoing use and viability of Space House, with no adverse effect on either its architectural or historic significance or the contribution this building makes to the character and appearance of the Kingsbridge Conservation Area.
- 6.4 In terms of national policy, the proposals do not constitute harm under the National Planning Policy Framework (NPPF), and therefore do not engage the tests set out in Paragraphs 212–215. They provide a modest enhancement to the significance of the building through appropriate internal modernisation, improving the building's usability, aesthetic quality, and long-term viability as an office space. There would be no harm to the significance of the listed building or the Kingsbridge Conservation Area.
- 6.5 With regard to local policy, the proposals are therefore compliant with the London Borough of Camden Local Plan, specifically:
- Policy D1 (Design) – by delivering a high standard of design which is appropriate in context;
 - Policy D2 (Heritage) – by preserving the special interest of the heritage asset and respecting its character.

6.6 The proposals also comply with the London Plan (2021), particularly:

- Policy HC1 (Heritage Conservation and Growth) – by ensuring the conservation of heritage significance and making a positive contribution to the continued sustainable use of the listed building.

APPENDIX 1 – METHODOLOGY

Heritage Assessment

- 6.7 This report provides an assessment of the significance of identified heritage assets and the potential effects of the proposed development. It has been informed by: Relevant legislation, and national and local planning policy (see Section 2); and
- 6.8 Best practice guidance set out in:
- Principals of Cultural Heritage Impact Assessment in the UK (IEMA/IHBC/CiFA, 2021)
 - Conservation Principles, Policies and Guidance (Historic England, 2008)
 - Good Practice Advice in Planning Notes (Historic England, various).
- 6.9 Heritage Assets are defined in Annex 2 of the National Planning Policy Framework (NPPF 2024) 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).'*
- 6.10 The scope of this assessment is considered to be proportionate to the significance of identified heritage assets and the nature of change proposed, in line with National Planning Policy Framework (NPPF 2024) paragraph 207.
- 6.11 While IEMA's Principles identifies that there is no 'one-size fits all' methodology for assessing impacts on cultural heritage, it provides guidance on heritage impact assessment. It identifies the need to understand cultural heritage assets by:
- Describing the asset;
 - Ascribing cultural significance; and Attributing importance.
 - And evaluate the consequences of change by: Understanding change;
 - Assessing impact (on significance or contribution of setting to significance); and Weighting the effect.

Understanding Significance and Importance

6.12 The methodology used here for ascribing the significance of the identified heritage assets draws from the approach set out in Historic England's Conservation Principles and NPPF Annex 2 by identifying significance based on heritage value or interest. As defined in the Planning Practice Guidance (Historic Environment, para 06), the heritage interest may be:

- Archaeological;
- Architectural and artistic; and/or
- Historic.

6.13 The methodology for attributing importance is set out in Table H1. IEMA's Principles identifies that unlike significance, importance is scaled and *'It is therefore appropriate to refer to 'high', 'medium' or 'low' importance or any other simple scale that offers a form of gradation'*. As such, designation is an obvious way of attributing importance.

6.14 IEMA's Principles clarifies that: *'in relative terms, impacts on the cultural significance of assets of higher importance will be given greater weight than those of lower importance'* (para. B.12). This aligns with NPPF para.199 on the weighting of impacts.

Non-designated Heritage Assets

6.15 Non-designated Heritage Assets ('NDHAs') are defined in Planning Practice Guidance (PPG, 2021) as buildings, structures and places which have a degree of heritage significance but do not meet the criteria for designation.

6.16 In paragraph 039 of the PPG, it notes: *'A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets'*.

6.17 IEMA's Principles notes that where heritage assets are not designated, *'it will be up to the practitioner to make an informed judgement on the level of importance to be ascribed'* (IEMA et al).

Setting

6.18 The setting of a heritage asset is defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral' (NPPF, Annex 2)

- 6.19 Historic England's GPA 3: The Setting of Heritage Assets (2nd Edition, December 2017) gives general advice on understanding setting and how it may contribute to the significance of heritage assets. This report follows the staged approach set out in this guidance to making decisions on the level of the contribution which setting and related views make to the significance of heritage assets.

Table H1: Heritage Importance

Heritage Importance	Designation of Receptor
Very High	Site acknowledged of international importance; World Heritage Site
High	Grade I or Grade II* Listed Asset, Scheduled Ancient Monument
Medium	Grade II Listed Asset, Conservation Area
Low	Locally Listed Asset, Designated Heritage Assets compromised by poor preservation
Very Low	Non-Designated Heritage Asset (not recognised as locally listed), Locally Listed Asset with little or no surviving interest