



Dear Charles'

Following Michael Hammerson's objection letter to you, please find attached a supplementary report

This has been produced by Jon Avent of Mann Williams, specialist Conservation Engineers, following an unsolicited approach to the HS. This deals specifically with Saville's report on behalf of the applicant justifying the demolition of Athlone House.

If you have any further queries or need any further information, please contact me.

Elsbeth

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Athlone House Hampstead London N6 4RU

Building Conservation Review

Prepared for



Project: 6761

Date: Jan 2014

Prepared By: Jon Avent *BSc(Hons) CEng MStructE IHBC
Accredited conservation engineer*



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1.0 Introduction

- 1.01 This document has been prepared for the Highgate Society and provides an initial review of structural and other conservation issues relevant to the proposed demolition of Athlone House, and proposals for its replacement with a new construction.
- 1.02 A physical survey of the building has not been possible at this stage, and the report is therefore a desk study, drawing on available information in the public domain, including specific documents on the local authority planning web site in relation to the proposals for the site.
- 1.03 A key aspect that is understood to have been used in support of a case for demolition is the poor condition of the building. Although there are no structural reports present on the planning register there is a summary Condition Report, prepared by Sean Monie, Savills, 20 Grosvenor Hill, London W1K 3HQ, dated September 2012. This has been reviewed as part of the desk study.
- 1.04 As an unlisted building within a conservation area there is national government guidance on the approach to such buildings, and the report will provide comment on potential issues for consideration.
- 1.05 The history of the building is a key aspect of the considerations in relation to any case for demolition. Appendix A of this document provides an historic overview.
- 1.06 I am Jon Avent, a director of Mann Williams consulting civil and structural engineers, 7 Old King Street, Bath, BA1 2JW. I am a Chartered Structural Engineer and a member of the Institution of Structural Engineers; BSc (Hons) CEng MStructE IHBC. I am a CARE accredited conservation engineer. I have been a chartered engineer for 20 years, and a director of Mann Williams since 1996. I have extensive experience in the inspection, appraisal, repair, conservation and reuse of historic buildings and structures. A copy of my CV is included in appendix E of this document.

2.0 Building Review

- 2.01 Athlone House is illustrated in the aerial photograph opposite. It was formerly known as Caen Wood Towers and was the residence of several prominent London men during the period between 1870 and 1940. It was designed by Edward Salomons and John Philpot in a Victorian style which reflects a variety of architectural traditions. It lies on the northern edge of Hampstead Heath.



2.02



The photograph opposite illustrates a typical elevation with a range of architectural detailing. Photographs from the Savilles report contained in the planning application would suggest a building in need of some care and repair, but no evidence of significant structural problems.

- 2.03 Suggestions that the building has little architectural merit or detailing would appear to be contradicted by the photographs available in the Savilles report. Roof details, Oriel windows and fine chimney details are examples that show features to be present, as illustrated in the images opposite.



2.04



Similarly, suggestions that internal details are absent or lost would also appear to be contradicted by the photographs available in the Savilles report. Fine cornicing details and a grand staircase are two examples that show internal features to be present, as illustrated in the images opposite.

- 2.05 When referring to elevations the Savilles report states in various sections:- ***'The Elevation is generally in poor condition with a number of significant defects'***
However, the subsequent text simply provides a list of dilapidations, with no associated justification on why they are perceived as being 'significant'.
- 2.06 Where the Savilles report makes reference to movement within the building it makes no reference to the magnitude of movement, and it is therefore impossible to gauge if this is something that might be considered 'significant'
- 2.07 Issues such as 'worn', 'eroded' or 'defective' pointing are all normal building maintenance issues and would reasonably be expected in a building of this period and construction that has had an absence of maintenance in recent years.
- 2.08 Section 9 of the Savilles report notes the need for ***'Engineer's Report relating to the structural integrity of the property'***, Unfortunately there does not appear to have been any recent Structural Reports prepared on the condition of the building. This would appear to be a significant omission in the justification of the building being beyond economic repair and renovation.
- 2.09 It has been noted that only a new building would provide the standard of building and amenity desired by the new owner. It must be put firmly on record that all photographic evidence on the planning web site would indicate the presence of an existing building that can be repaired and refurbished to a very high standard of accommodation and amenity. The desire to demolish would appear to be only a personal choice of the building owner, but without any physical justification provided by the condition of the existing.

3.0 Unlisted Buildings in a Conservation Area

- 3.01 The proposal for the replacement of the existing building with a new structure requires demolition of an unlisted building located within a conservation area. Special consideration of the issues surrounding such a proposal is required.
- 3.02 An unlisted building in a conservation area is afforded special protection if it is deemed that the building makes a positive contribution to the conservation area (NPPF para 138 requires such a building to be considered under para 133).
- 3.03 Government policy with regard to the demolition of buildings in a conservation area are to be found in the National Planning Policy Framework and the PPS5 Practice Guide which remains a valid and Government endorsed document pending the results of a review of guidance supporting national planning policy. The references to PPS5 policies in the document are now redundant but they remain as policy. The policies in the NPPF are very similar and the intent is the same, so the Practice Guide remains almost entirely relevant and useful in the application of the NPPF. For reference appendix C provides Comparison of PPS5 Policies with Historic Environment-Related Policies in the NPPF – Part 1 English Heritage 5 April 2012
- 3.04 It is national government policy that local planning authorities shall give 'great weight' to the asset's conservation. The policy is that the more important the asset, the greater the weight should be.
- 3.05 Heritage Asset -The NPPF describes a heritage asset as "A building, monument, site, place or landscape identified as having a degree of significance meeting consideration in planning decisions because of its heritage interest...."
- 3.06 Significance – The NPPF describes significance as 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical appearance, but also from its setting'
- 3.07 In arriving at an opinion relating to the 'significance' of the building, one need look no further than the English Heritage advice contained in their publication 'Guidance on Conservation Appraisals'.
- 3.08 At Appendix 2 (reference appendix B of this report) with reference to unlisted buildings in a conservation area it provides the following advice.
"When considering the contribution made by unlisted buildings to the special architectural or historic interest of a conservation area, the following questions might be asked:"

3.09 It then gives ten questions which can be considered in the context of Athlone House.

- Is the building the work of a particular architect of regional or local note?
- Does it have landmark quality?
- Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?
- Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?
- Does it contribute positively to the setting of adjacent designated heritage assets?
- Does it contribute to the quality of recognisable spaces, including exteriors or open spaces with a complex of public buildings?
- Is it associated with a designed landscape e.g. a significant wall, terracing, or a garden building?
- Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?
- Does it have significant historic association with features such as the road layout, burgage plots, a town park, or a landscape feature?
- Has it significant historic associations with local people or past events?
- Does it reflect the traditional functional character of, or former uses in, the area?
- Does its use contribute to the character or appearance of the conservation area?

3.10 The publication 'Guidance on Conservation Appraisals' goes on to say that:-

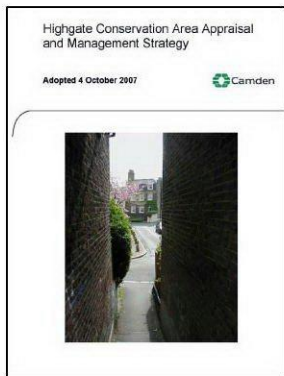
3.11 *"In English Heritage's view, any one of these characteristics could provide the basis for considering that a building makes a positive contribution to the special interest of a conservation area, provided that its historic form and values have not been seriously eroded by unsympathetic alteration."*

- 3.12 It is therefore quite reasonable to conclude that the more of the criteria that apply then the greater the significance the building has and the greater the weight that should be given to its conservation.
- 3.13 This neo-Elizabethan style Victorian mansion, known originally as Caen Wood Towers, was built in 1871 by Edward Brooke, JP, a businessman who had made his fortune in the chemical industry manufacturing aniline dye.
- 3.14 During WW1 the house became a military convalescent hospital, when it was known as the American Hospital for English Soldiers. The King and Queen visited it in April 1916.
- 3.15 During WW2, under the guise of being an RAF convalescence hospital for officers, in 1942 Caen Wood Towers became the RAF Intelligence Training School. In 1944 two near misses from V1 flying bombs caused some injuries to the staff and damage to the buildings.
- 3.16 The Ministry of Health acquired the site in 1951 and Caen Wood Towers was converted into a convalescent home for the Middlesex Hospital. Dr John Wedgwood (a member of the famous pottery family), a geriatric care specialist, helped establish it as the second post-war geriatric hospital. It was renamed Athlone House in 1955.
- 3.17 These are significant historic associations with local people and past events and meet the criteria defined in the English Heritage Guidance. Any replacement building would immediately wipe away these historical aspects of the Heritage Asset, and the result is inevitable harm to the heritage asset. This can only be to the detriment of the Asset and it must be strongly questioned how a new building can sufficiently offset such a loss of heritage value. The ability to preserve or sustain this social aspect of the heritage value is not available through demolition, and in itself could be considered a compelling reason for retention of Athlone House.
- 3.18 There are discussions on the justification for a replacement based on it being of 'sufficient high quality', yet the term 'quality' appears to be blurred with an apparent desire for 'quantity' as the over-riding objective.
- 3.19 In relation to the question of justification for the listing of Athlone House, the report prepared by English Heritage is included in appendix C. The conclusion of this report, issued in 2010, was not to list the building. However, it is observed that the building was not viewed internally.

- 3.20 Camden council have a Conservation Area Appraisal and Management Strategy Document for Highgate. The purpose of the Conservation Area Appraisals and Management Strategies are recognised as being of considerable importance in providing a sound basis for guiding the types of alterations and development that are likely to be acceptable or unacceptable in each area. The purpose of the document is to provide a clear indication of the Council's approach to the preservation and enhancement of the Highgate Conservation Area. The Appraisal and Management Strategy are for the use of local residents, community groups, businesses, property owners, architects and developers and is an

aid to the formulation and design of development proposals and change in this particular area.

It is stated policy that the document will be used by the Council in the assessment of all development proposals.



- 3.21 Athlone House is specifically referenced in the document (at page 38) which states:-
This elaborate property is set into the hillside overlooking the Heath and is visible in long views such as from Kenwood House. As such, it is a positive contributor to the Conservation Area.
- 3.22 The document also states (page 10):-
In the 21st century, the Conservation Area is facing unprecedented pressure for residential development, often involving the demolition of existing single family dwellings to create luxury residences of high specification with potentially inappropriate scale and design for the character of the area.

4.0 Conclusion

- 4.01 The application for demolition of Athlone House has not been supported by any robust justification on the condition of the building or provision of reasons why it is not capable of repair and restoration.
- 4.02 All the photographic evidence contained in the documents submitted with the planning application suggest a building only in need of maintenance and refurbishment in common with many similar buildings returned to a high standard of habitable use on a regular basis.
- 4.03 Under paragraph 130 of the NPPF it is noted that ***'Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.'*** It is not immediately clear to what extent (if any) deliberate neglect may have occurred, however if the building is in a state where deterioration is known to be progressing and no action is taken then consideration of this paragraph may be relevant.
- 4.04 The social history relating to Athlone House, including the prominent industrialists who contributed to the construction and evolution of the site, gives the building significance and heritage value as referenced in the English Heritage Document 'Guidance on conservation area appraisal'. This is a material factor in rejecting demolition of the building.
- 4.05 Athlone House is specifically designated in Camden councils Conservation Area Appraisal and Management Strategy Document for Highgate as being:-
'a positive contributor to the Conservation Area'.
- 4.06 There is evidence that the building contains a range of original architectural features, both internally and externally, and these are relevant to its heritage value. There is no evidence presented that shows any of these features are beyond repair, or indeed even in need of repair.
- 4.07 It has been noted that demolition might be possible *'if a replacement is of sufficiently high quality'*, however there appears to be no definition of what ***'sufficiently high'*** requires. The fact that the level of *'quality'* would have to outweigh the stated damage caused by the loss of the heritage asset would appear to make the task of reaching such a level of *quality* impossible.
- 4.08 In summary there is considered to be no justification for the demolition of Athlone House.

Appendices

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Appendix A

Athlone House (formerly Caen Wood Towers), Highgate Historical Overview

From Wikipedia

Athlone House in Highgate, England was formerly known as Caen Wood Towers and was the residence of several prominent London men during the period between 1870 and 1940. It was designed by Edward Salomons and John Philpot in a Victorian style which reflects a variety of architectural traditions. It lies on the northern edge of Hampstead Heath and is visible from several parts of the Heath.



Caen Wood Towers (south view) circa 1900.

The origin of the house



An engraving of Caen Wood Towers shortly after it was built by Edward Brooke, circa 1880.

Edward Brooke built the house in about 1872. Brooke was born in Manchester in 1832.^[1] He married in 1857 Jane Emily Alston and had many children. He also owned a property called Pabo Hall in Conwy, Wales which still has his portrait in the hallway.

In 1869 Brooke came from Manchester to London and bought Lord Dufferin's estate at Highgate. Shortly after, he built Caen Wood Towers on this property.^[2] In 1877 his wife Jane died and in the following year he married Frances Amyand Bellairs, daughter of the Reverend Henry Walford Bellairs.^[3] He was a partner in the firm of Brooke, Simpson and Spiller who were aniline dye manufacturers in London.

Edward Brooke became Justice of the Peace for the County of Middlesex, for the City of London and for the County of Carnarvon. He was also one of Her Majesty's Commissioners for the Lieutenancy of the City of London.^[4] In 1880 the book entitled "A series of picturesque views of seats of the noblemen and gentlemen of Great Britain and Ireland" included a coloured engraving of Caen Wood Towers and a descriptive article about Edward Brooke and the house.^[5] The coloured engraving is shown on the right and a link to the article is in the reference below.

Brooke left Caen Wood Towers in about 1885 and Francis Reckitt and his family came to live in the house.^[6]

Francis Reckitt

Francis Reckitt, was a partner in the famous company of Reckitt and Sons. His father Isaac had founded the firm and he and his brother Sir James Reckitt were very prominent Directors at the time he resided at Caen Wood Towers.



Francis Reckitt 1892.

Francis Reckitt became very wealthy and donated a great deal of money to establish public institutions. For example in 1897 he paid for the Newland Homes Francis Reckitt House which was for infants.^[9] He also provided the funds for the establishment of a new reference library within an existing library in Hull in 1890.^[10] The Reckitt Convalescent Home (now demolished) was built in 1907 with money donated by Francis.^[11]

Francis left Caen Wood Towers in about 1900 and Sir Cory Francis Cory-Wright became the owner of the house.

Sir Francis Cory-Wright

Sir Francis Cory-Wright was Chief of the large coal distribution firm called William Cory and Sons. He was considered to be one of the best known commercial men in the City of London and a chapter was written about him in the book entitled "London Leaders" in 1907.^[12]



*Sir Francis Cory-Wright
circa 1900.*

Sir Francis was born in 1839. His father was Lieutenant William Wright of the Rifle Brigade. He was educated privately and entered the firm of William Cory and Sons at the age of 21. He became Chief of the company in 1888 and was credited with the large development of this firm which occurred after his appointment.



Caen Wood Towers (east view) circa 1900.

In 1868 he married Mima Owen who was the youngest daughter of Sir Hugh Owen. The couple had two sons and three daughters. Sir Francis was very interested in local affairs particularly in the Highgate region. He led the movement to save for public use the area then known as Churchyard Bottom but is now known as Queen's Wood.^[13]

Sir Francis died at Caen Wood Towers in 1909. His widow remained at the house until 1911 when it was sold to Thomas Frame Thompson.^[14] Unfortunately only two years later Thomas was killed in a shooting accident. The property was then sold in 1914 to Charles Henry Watson who also owned a home called Ashmount in Hampstead. In 1919 he sold Caen Wood Towers to Sir Robert Waley Cohen.^[15]

Sir Robert Waley Cohen

Sir Robert Waley Cohen was the Managing Director of the Shell Company. He was the longest and most prominent resident of Caen Wood Towers. He lived there for over twenty years between 1919 and 1942.

Robert Waley Cohen was born in London in 1877. His father was Nathaniel Louis Cohen and his mother was Julia Waley, daughter of Jacob Waley, Professor at University College, London. After Robert left Cambridge University he entered the Shell Company and was progressively promoted until he became the Managing Director.^[16]

In 1904 he married Alice Violet Beddington and the couple had two sons and a daughter. While they resided at Caen Wood they held numerous social events at the house and Lady Waley Cohen often allowed the gardens to be used for fetes and parties for girls clubs, Boy Scouts and to raise money for the less fortunate.^[17]

Lady Waley Cohen died in 1935 but Sir Robert continued to live at Caen Wood Towers until about 1942 when it was taken over by the RAF and used as the Intelligence Training School. A description of the training given during the war at the house is contained in the book "Shot Down and on the Run" and an online link to this part of the book is given in the reference below.^[18]



*Sir Robert Waley Cohen
circa 1920.*

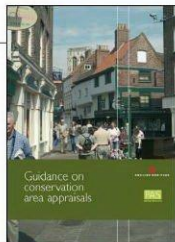
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13. Obituary of Sir Francis Cory-Wright, The Times (London) May 31, 1909; pg. 9
14. Online reference. <http://news.google.com/newspapers?id=xF5eAAAAIBAJ&sjid=E2ENAAAAIBAJ&pg=4190.3902427&dq=caen+wood+towers&hl=en> (at bottom of page)
15. The Times (London), October 09, 1919; pg. 13
16. The Times (London), November 29, 1952; pg. 8
17. The Times (London), January 25, 1935; pg. 16;
18. Pitchfork, G. 2003 "Shot Down and on the Run", p. 18. Online reference <http://books.google.com.au/books?id=EGxzyTDErVEC&pg=PA18&dq=RAF+caen+wood&hl=en&sa=X&ei=pt8FT9XXCaW3iQeCpZnbDQ&ved=0CDYQ6AEwAQ#v=onepage&q=RAF%20caen%20wood&f=false>

Appendix B

English Heritage Document Extract Guidance on conservation area appraisal

Appendix 2 Unlisted buildings in a conservation area



When considering the contribution made by unlisted buildings to the special architectural or historic interest of a conservation area, the following questions might be asked:

- Is the building the work of a particular architect of regional or local note?
- Has it qualities of age, style, materials or any other characteristics which reflect those of at least a substantial number of the buildings in the conservation area?
- Does it relate by age, materials or in any other historically significant way to adjacent listed buildings, and contribute positively to their setting?
- Does it individually, or as part of a group, serve as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of growth?
- Does it have significant historic association with established features such as the road layout, burgage plots, a town park, or a landscape feature?
- Does the building have landmark quality, or contribute to the quality of recognisable spaces, including exteriors or open spaces with a complex of public buildings?
- Does it reflect the traditional functional character of, or former uses within, the area?
- Has it significant historic associations with local people or past events?
- Does its use contribute to the character or appearance of the conservation area?
- If a structure associated with a designed landscape within the conservation area, such as a significant wall, terracing or a minor garden building, is it of identifiable importance to the historic design?

In English Heritage's view, any one of these characteristics could provide the basis for considering that a building makes a positive contribution to the special interest of a conservation area, provided that its historic form and values have not been seriously eroded by unsympathetic alteration.

Appendix C

Comparison of PPS5 Policies with Historic Environment-Related Policies in the NPPF – Part 1 English Heritage 5 April 2012

Comparison of PPS5 Policies with Historic Environment-Related Policies in the NPPF – Part 1 English Heritage 5 April 2012

This is initial guidance produced by English Heritage to assist in the transition from PPS5 to the NPPF.

You should check the text of the published version as some of the quotes are selective within paragraphs and other parts of the NPPF text may also be relevant.

PPS5 policies	NPPF (key elements underlined, comments from EH in italics)
4. The policies and principles set out in this statement also apply to the consideration of the historic environment in relation to the other heritage-related consent regimes for which planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990.	Footnote 29 in para 126 states that 'The principles and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-taking
5. Those parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest are called heritage assets. Some heritage assets possess a level of interest that justifies designation (see Annex 2) and particular procedures apply to decisions that involve them. This statement also covers heritage assets that are not currently designated or are not capable of designation under current heritage protection legislation, but which have a level of interest which should be conserved'. The historic environment within National Parks, the Broads and Areas of Outstanding Natural Beauty is also the subject of general policies within PPS7.	'Historic environment', 'archaeological interest', 'heritage asset' and 'designated heritage asset' are covered in the definitions pgs51-57 NPs and AONBs are covered in para 115, although the broader term 'cultural heritage' is used.
6. The value of the historic environment, and the contribution it makes to our cultural, social and economic life, is set out in the Government's Statement on the Historic Environment for England 2010. Planning has a central role to play in conserving our heritage assets and utilising the historic environment in creating sustainable places. This PPS comprises policies for implementing through the planning system the Government's vision for the historic environment as set out in the 2010 Statement.	Ministerial Foreword: Sustainable development is about change for the better, and not only in our built environment. Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers. 6. The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system 7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the

7. The Government's overarching aim is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations. To achieve this, the Government's objectives for planning for the historic environment are: - recognise that heritage assets are a non-renewable resource; - take account of the wider social, cultural, economic and environmental benefits of heritage conservation; and - recognise that properly considered change will often be necessary and desirable if heritage assets are to remain relevant and be maintained in the long term. to conserve England's heritage assets in a manner appropriate to their significance by ensuring that: - decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the	planning system to perform a number of roles: ● an economic role –...[text edited]...; ● a social role –...[text edited]; and by creating a high quality built environment,....; and ● an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. 8. These roles should not be undertaken in isolation, because they are mutually dependent... 9. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life...
	14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that: ● local planning authorities should positively seek opportunities to meet the development needs of their area; ● Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or—specific policies in this Framework indicate development should be restricted. [footnote: For example, those policies relating to ...an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); <u>designated heritage assets</u>;...]

importance of the heritage asset;

- wherever possible, heritage assets are put to an appropriate and viable use that is consistent with their conservation;
- the positive contribution of such heritage assets to local character and sense of place is recognised and valued; and
- consideration of the historic environment is integrated into planning policies, promoting place-shaping, to contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available, particularly where a heritage asset is to be lost.

For **decision-taking** this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or—specific policies in this Framework indicate development should be restricted. [same footnote as for plan-making above]
- 17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should: *only the most relevant principles are shown*
 - always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
 - support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
 - encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
 - promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
 - conserve heritage assets in a manner appropriate to their significance,

	so that they can be enjoyed for their contribution to the quality of life of this and future generations; <i>Note that relevant historic environment-specific considerations are set out in 126 and 131.</i>
Policy HE1: Heritage assets and climate change HE1.1 Local planning authorities should identify opportunities to mitigate, and adapt to, the effects of climate change when devising policies and making decisions relating to heritage assets by seeking the reuse and, where appropriate, the modification of heritage assets so as to reduce carbon emissions and secure sustainable development. Opportunities to adapt heritage assets include enhancing energy efficiency, improving resilience to the effects of a changing climate, allowing greater use of renewable energy, incorporating sustainable drainage and allowing for the sustainable use of water. Keeping heritage assets in use reduces the consumption of building materials and energy and reduces waste. HE1.2 Where proposals that are promoted for their contribution to mitigating climate change have a potentially negative effect on heritage assets, local planning authorities should, prior to determination, and ideally during pre-application discussions, help the applicant to identify feasible solutions that deliver similar climate change mitigation but with less or no harm to the significance of the heritage asset and its setting. HE1.3 Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change should be weighed against any harm to the significance of heritage assets in accordance with the development management principles in this PPS and national planning policy on climate change.	<i>There is now no specific policy relating to the historic environment and climate change. However there are some general policies:</i> 94. Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. 95. To support the move to a low carbon future, local planning authorities should: • plan for new development in locations and ways which reduce greenhouse gas emissions; • actively support energy efficiency improvements to existing buildings; and • when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. 97. To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should: • have a positive strategy to promote energy from renewable and low carbon sources; • design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; • consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources <i>[footnote states that wind</i>

energy schemes should be assessed in accordance using the approach set out in the Renewable Energy Infrastructure NPS).

- support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and
- identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

98. When determining planning applications, local planning authorities should:

- not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
- approve the application [footnote: unless material considerations indicate otherwise] if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should also expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

Policy HE2: Evidence base for plan-making HE2.1 Regional and local planning authorities should ensure that they have evidence about the historic environment and heritage assets in their area and that this is publicly documented. The level of detail of the evidence should be sufficient to inform adequately the plan-making process. HE2.2 Local planning authorities should either maintain or have access to a historic environment record.² HE2.3 Local planning authorities should use the evidence to assess the type, numbers, distribution, significance and condition of heritage assets and the contribution that they may make to their environment now and in the future. It should also be used to help predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.	158. Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. ... 169. Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record. 170. Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.
	<i>Note: 126 to 141 are the core historic environment policies in chapter 12 of the NPPF (all parts of these paragraphs are important and for ease of reading are highlighted in yellow rather than being underlined).</i>
Policy HE3: Regional and local planning approaches HE3.1 Regional spatial strategies (RSS) and local development frameworks (LDF) should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account the variations in type and distribution of heritage asset, as well as the contribution made by the historic environment by virtue of: i) its influence on the character of the environment and an area's sense of place;	126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment[footnote: The principles and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-taking.], including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are

² Most historic environment records (HERs) are hosted by unitary/upper tier local authorities and National Park Authorities – and in Greater London, by English Heritage. Details can be found at <http://www.heritagateway.org.uk/Gateway/CHR>

³ References in this paragraph to the regional spatial strategy should be taken to refer to the regional strategy once the Local Democracy, Economic Development and Construction Bill is brought into force.

⁴ Historic characterisation provides a useful approach for assimilating this information.

- ii) its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development;
- iii) the stimulus it can provide to inspire new development of imaginative and high quality design;
- iv) the re-use of existing fabric, minimising waste; and
- v) its mixed and flexible patterns of land use that are likely to be, and remain, sustainable.

HE3.2 The level of detail contained in an RSS or LDF should reflect the scale of the area covered by the plan and the significance of the heritage assets within it.

HE3.3 At a regional level, the character and significance of the historic environment should inform the RSS 'with particular attention paid to the landscapes and groupings or types of heritage assets that give distinctive identity to the region or areas within it'. Some individual heritage assets such as World Heritage Sites are likely to have regional significance in plan-making.

HE3.4 At a local level, plans should consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the local development framework core strategy. Heritage assets can be used to ensure continued sustainability of an area and promote a sense of place. Plans at a local level are likely to consider investment in and enhancement of historic places, including the public realm, in more detail. They should include consideration of how best to conserve individual, groups or types of heritage assets that are most at risk of loss through neglect, decay or other threats (see also policy HE5.1).

an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

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

In the general plan-making section:

156. Local planning authorities should set out the **strategic priorities** for the area in the Local Plan. This should include strategic policies to deliver: *[various policies including]*

- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

157. Crucially, Local Plans should: *[various policies including]*

- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Policy HE4: Permitted development and article 4 directions HE4.1 Local planning authorities should consider whether the exercise of permitted development rights would undermine the aims for the historic environment. If it would, local planning authorities should consider the use of an article 4 direction to ensure any development is given due consideration	200. The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities). Similarly, planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so.
Policy HE5: Monitoring indicators HE5.1 Local planning authorities should consider how they can best monitor the impact of their planning policies and decisions on the historic environment. They should pay particular attention to the degree to which individual or groups of heritage assets are at risk of loss or decay, how they expect this will change over time, and how they propose to respond.	No equivalent policy to HE5.1.
Policy HE6: Information requirements for applications for consent affecting heritage assets HE6.1 Local planning authorities should require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the relevant historic environment record should have been consulted and the heritage assets themselves should have been assessed using appropriate expertise where necessary given the application's impact.	127. 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. This is a new policy with no equivalent in PPS5.
128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage	128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage

⁸ The local planning authority has a duty to consider conservation area designation pursuant to s69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Where an application site includes, or is considered to have the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation⁶.	assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
HE6.2 This information together with an assessment of the impact of the proposal should be set out in the application (within the design and access statement when this is required) as part of the explanation of the design concept. It should detail the sources that have been considered and the expertise that has been consulted.	<i>There is no equivalent policy to HE6.2.</i>
HE6.3 Local planning authorities should not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents.	<i>There is no equivalent policy to HE6.3.</i>

⁶ Field evaluations which involve the disturbance of buried human remains will need to comply with the relevant burial legislation and local planning authorities should avoid imposing requirements which may conflict with other statutory provisions.

Policy HE7: Policy principles guiding the determination of applications for consent relating to all heritage assets

HE7.1 In decision making local planning authorities should seek to identify and assess the particular significance of any element of the historic environment that may be affected by the relevant proposal (including by development affecting the setting of a heritage asset) taking account of:

- evidence provided with the application;
- any designation records;
- the historic environment record and similar sources of information;
- the heritage assets themselves;
- the outcome of the usual consultations with interested parties; and,
- where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice (from in-house experts, experts available through agreement with other authorities, or consultants, and complemented as appropriate by advice from heritage amenity societies).

HE7.2 In considering the impact of a proposal on any heritage asset, local planning authorities should take into account the particular nature of the significance of the heritage asset and the value that it holds for this and future generations. This understanding should be used by the local planning authority to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.

HE7.3 If the evidence suggests that the heritage asset may have a special significance to a particular community that may not be fully understood from the usual process of consultation and assessment, then the local planning authority should take reasonable steps to seek the views of that community.

129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Part of HE7.2 is covered in 129 above.

There is no equivalent policy to HE7.3.

⁷ Annex 2 provides an explanation of the different types of significance a heritage asset may have.

HE7.4 Local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets, and of utilising their positive role in place-shaping; and
- the positive contribution that conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable communities and economic vitality by virtue of the factors set out in HE3.1

131. In determining planning applications, 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;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

186. Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. The relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground.

187. Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

HE7.5 is partially covered in paras 9, 17, 186 and 187 outlined above, and in para 59:

59. Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

HE7.5 Local planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.

HE7.6 Where there is evidence of deliberate neglect of or damage to a heritage asset in the hope of obtaining consent, the resultant deteriorated state of the heritage asset should not be a factor taken into account in any decision.

130. Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.

HE7.7 Where loss of significance is justified on the merits of new development, local planning authorities should not permit the new development without taking all reasonable steps to ensure the new development will proceed after the loss has occurred by imposing appropriate planning conditions or securing obligations by agreement.	136. Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
Policy HE8: Additional policy principle guiding the consideration of applications for consent relating to heritage assets other than designated heritage assets HE8.1 The effect of an application on the significance of a non-designated heritage asset or its setting is a material consideration in determining the application.	135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Policy HE9: Additional policy principles guiding the consideration of applications for consent relating to designated heritage assets

HE9.1 There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, including scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings and grade I and II* registered parks and gardens, world heritage sites, should be wholly exceptional.

HE9.2 Where the application will lead to substantial harm to or total loss of significance local planning authorities should refuse consent unless it can be demonstrated that:

- (i) the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss; or
- (ii) (a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - (b) no viable use of the heritage asset itself can be found in the medium term that will enable its conservation; and
 - (c) conservation through grant-funding or some form of charitable or public ownership is not possible; and,

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

⁸ Development affecting Scheduled Monuments and Protected Wreck Sites will also require prior consent from the Secretary of State for Culture, Media and Sport (see <http://www.culture.gov.uk/>). In such cases, local planning authorities should encourage applications for all relevant consents to be made in parallel.

(d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.	● the harm or loss is outweighed by the benefit of bringing the site back into use.
HE9.3 To be confident that no appropriate and viable use of the heritage asset can be found under policy HE9.2 (ii) local planning authorities should require the applicant to provide evidence that other potential owners or users of the site have been sought through appropriate marketing and that reasonable endeavours have been made to seek grant funding for the heritage asset's conservation and to find charitable or public authorities willing to take on the heritage asset.	This is partially covered in para 133 above. <i>English Heritage expects to issue updated guidance on marketing shortly.</i>
HE 9.4 Where a proposal has a harmful impact on the significance of a designated heritage asset which is less than substantial harm, in all cases local planning authorities should: (i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long-term conservation) against the harm; and (ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.	134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
HE9.5 Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The policies in HE9.1 to HE9.4 and HE10 apply to those elements that do contribute to the significance. When considering proposals, local planning authorities should take into account the relative significance of the element affected and its contribution to the significance of the World Heritage Site or Conservation Area as a whole. Where an element does not positively contribute to its significance, local planning authorities should take into account the desirability of enhancing or better revealing the significance of the World Heritage Site or Conservation Area, including, where appropriate, through development of that element. This should be seen as part of the process of place-shaping.	137. 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. 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. 138. Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. 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 133 or less than substantial harm under paragraph 134, 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.

HE9.6 There are many heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance. These include heritage assets:

- that have yet to be formally assessed for designation;
- that have been assessed as being designatable, but which the Secretary of State has decided not to designate; or
- that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979.

The absence of designation for such heritage assets does not indicate lower significance and they should be considered subject to the policies in HE9.1 to HE9.4 and HE10.

139. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

⁹ Advice and information about the significance of known, but non-designated heritage assets with archaeological interest may be obtained from County Archaeologists and historic environment records, respectively.

Policy HE10. Additional policy principles guiding the consideration of applications for development affecting the setting of a designated heritage asset HE10.1 When considering applications for development that affect the setting of a heritage asset, local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. When considering applications that do not do this, local planning authorities should weigh any such harm against the wider benefits of the application. The greater the negative impact on the significance of the heritage asset, the greater the benefits that will be needed to justify approval. HE10.2 Local planning authorities should identify opportunities for changes in the setting to enhance or better reveal the significance of a heritage asset. Taking such opportunities should be seen as a public benefit and part of the process of place-shaping	Setting issues have been integrated into the relevant policies and are referenced in paras 128, 129, 132 and 137. 'Setting of a heritage asset' is defined in the glossary 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.' It is also mentioned in the definition of 'Significance': Significance derives not only from a heritage asset's physical presence but also from its setting. HE10.2 is covered in general terms in para 9 (seeking positive improvements in the quality of the built, natural and historic environment), 126 and 157 all covered above.
Policy HE11: Enabling Development HE11.1 Local planning authorities should assess whether the benefits of an application for enabling development to secure the future conservation of a heritage asset outweigh the disbenefits of departing from the development plan (having regard to the requirements of section 38(6) of the Planning and Compulsory Purchase Act 2004¹⁰) or from national policies, taking into account whether: - it will materially harm the significance of the heritage asset or its setting; - it will avoid detrimental fragmentation of management of the heritage asset; - it will secure the long term future of the heritage asset	140. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies There is also a reference in p55 in relation to new isolated homes in the countryside which might be justified if (among other reasons) where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets.

¹⁰ Note that these criteria are listed as a starting point; what is a material consideration will always depend on the circumstances of the individual case and this list is not comprehensive.

- and, where applicable, its continued use for a purpose sympathetic to its conservation;
- it is necessary to resolve problems arising from the inherent needs of the heritage asset, rather than the circumstances of the present owner, or the purchase price paid;
 - there is a source of funding that might support the heritage asset without the need for enabling development;
 - the level of development is the minimum necessary to secure the future conservation of the heritage asset and of a design and type that minimises harm to other public interests.

It is anticipated that enabling development issues will be covered in more detail in supporting guidance. The principles set out in English Heritage's Enabling Development Guidance (2008) remain unchanged although the document will be edited in due course to fully integrate it into the new NPPF context.

Policy HE12: Policy principles guiding the recording of information related to heritage assets HE12.1 A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of our past should not be a factor in deciding whether a proposal that would result in a heritage asset's destruction should be given consent. HE12.2 The process of investigating the significance of the historic environment, as part of plan-making or development management, should add to the evidence base for future planning and further the understanding of our past. Local planning authorities should make this information publicly available, including through the relevant historic environment record. HE12.3 Where the loss of the whole or a material part of a heritage asset's significance is justified, local planning authorities should require the developer to record and advance understanding of the significance of the heritage asset before it is lost, using planning conditions or obligations as appropriate. The extent of the requirement should be proportionate to the nature and level of the asset's significance. Developers should publish this evidence and deposit copies of the reports with the relevant historic environment record. Local planning authorities should require any archive generated to be deposited with a local museum or other public depository willing to receive it¹¹. Local planning authorities should impose planning conditions or obligations to ensure such work is carried out in a timely manner and that the completion of the exercise is properly secured.	141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. [footnote: 30 Copies of evidence should be deposited with the relevant Historic Environment Record, and any archives with a local museum or other public depository.] However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.
Definitions in NPPF	Definitions in PPS5: 'Conservation', 'Designated Heritage Asset' and 'Setting' remain unchanged. 'Architectural and Artistic Interest', 'Enabling Development' and 'Historic Interest' are not in the glossary. <i>English Heritage publications on 'Conservation Principles' (2008) and 'Enabling Development' (2008) explain these terms. The following definitions have changed::</i>

¹¹ Where the archive includes excavated human remains, any requirements as to the recording of the disposal of human remains will need to be taken into account.

Archaeological interest: An interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These heritage assets are part of a record of the past that begins with traces of early humans and continues to be created and destroyed.	Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.
Heritage asset: A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in this PPS) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).	Heritage asset: 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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Those elements of the historic environment that hold significance are called heritage assets.	Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Historic environment record (HER): Historic environment records are information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use. Typically, they comprise databases linked to a geographic information system (GIS), and associated reference material, together with a dedicated staffing resource.	Historic environment record: Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.
Significance: The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic [footnote: The accompanying Practice Guide expands on how one can analyse the public's interest in heritage assets by sub-dividing it into aesthetic, evidential, historic and communal values. This is not policy, but a tool to aid analysis.	Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Appendix D

English Heritage (Listing) Advice Report

ADDRESS

Athlone House, HAMPSTEAD LANE, HAMPSTEAD
18 MAY 2010
Parish HAMPSTEAD
District CAMDEN
County GREATER LONDON
Case UID: 156163

RECOMMENDATION

Outcome: No, do not list Recommended Grade: NL 17 -FEB-2004

BACKGROUND:

After examining all the papers on this file and other relevant information and having carefully considered the architectural and historic interest of this case, the criteria for listing are not fulfilled. This imposing High Victorian heathside villa was designed by the lesser-known architectural practice of Salomons and Jones for one Edward Brooke; the design was published in The Builder in 1872. A truly hybrid affair in terms of architectural style, its inspiration was highly picturesque: its visual relationship with Hampstead Heath is strong, and the appearance of the classical tower looming over banks of trees is reminiscent of landscape paintings by Claude. Survivals of opulent merchant houses in the inner suburbs are now relatively few, which adds to the interest of this building: so too does the survival of various internal features within.

Architectural purists might object to the stylistic eclecticism of the end result, which blends Gothic, Jacobean, French Renaissance, Greek Revival and Swiss Cottage elements together, but this is rather to miss the point about high Victorian eclecticism, which willfully plundered from various epochs of the past. Salomons and Jones were hardly masters of the genre, however, and it would be difficult to make claims for this as high architecture. The reason why Athlone House has not been listed in the past is, however, because of the extent of alterations. The architects may well have departed from their published design during the construction of this house, but it is evident that many losses have subsequently been sustained by the exterior, which just tip it over the balance of being listable. All-important visual accents have been lost, such as the cresting to the belvedere tower; the moulded gables have been replaced with plain straight versions; verandahs have been lost; and the inevitable result of decades of institutional use has worn down the architectural finesse of the house. As stated earlier, this is a prominently cited house which makes a clear visual contribution to the environs of Hampstead Heath. It has been rejected for listing in the past, however, and no new information has been advanced to demand a reversal of earlier advice. One rejects a building of such character for listing with a heavy heart, but it is clear that the past verdicts were fair in their appraisal of the building, and their recommendation should be upheld once more.

ASSESSMENT:

This building was rejected for spot-listing in 1993 and 1999, and left off the revised list for Camden.

REASONS FOR DESIGNATION DECISION:

Designed by Salomons and Jones in 1872, this finely situated and highly eclectic house on the edge of Hampstead Heath has undergone too many alterations for listing to be appropriate.

English Heritage (Listing) Advice Report

VISITS: None: Data from other sources

Appendix D

Curriculum Vitae



Director

Jon Avent

BSc (Hons) CEng MStrucE IHBC
Accredited conservation engineer



Mount Stewart House, NI



Roman Baths
Education Centre
Feasibility Study 2011



Conwy Town Walls



Stoneleigh Abbey



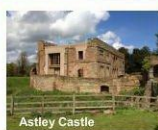
St Catherine's Orangery



Winchester Cathedral



Gwrych Castle



Astley Castle



Birnbeck Pier

Jon joined **Mann Williams** in 1989 gaining extensive experience across a wide range of construction techniques; progressing to Director level in 1996.

He has worked on a wide range of projects across the UK, including many Grade 1 properties and Scheduled Monuments, for clients including the National Trust, Cadw, NIEA, many local authorities, Building Preservation Trusts and private clients.

In 2004 Jon was one of the first UK engineers to achieve Accreditation under the Institute of Civil and Structural engineers scheme ('CARE') which recognises competence and experience in the field of Building Conservation. He is currently Chair of the CARE Panel and also sits on the RICS Conservation forum boards and the Edinburgh Group.

Other experience includes the of running combined restoration and newbuild projects on confined and difficult sites which require quick and incisive decision making.

At Mount Stewart House in Northern Ireland Jon has recently been commissioned by the National Trust on a £6m conservation scheme to enable the house to be more extensively opened to the public. Works involve repairs and strengthening to existing floor structures and repairs to extensive superstructure movement encountered throughout the building.

Jon's pragmatic approach, intuitive design and practical nature ensure that the structural and civil input to his projects are decisive and easily executed, with buildability high on the list of key objectives.

Experience gained on difficult sites, either through contamination, poor ground, or poor access enables potential problems to be resolved at an early stage, ensuring cost effective solutions.

A selection of recent conservation projects Jon has been involved in are listed below and illustrated in the photographs opposite:-

- **Astley Castle – RIBA Stirling Prize 2013**
Repairs and conservation works to stabilize ruinous fortified manor house and create contemporary accommodation within the building.
- **Stoneleigh Abbey**
Conservation works to masonry structures, cast iron bridge and water control feature within listed historic gardens and parkland.
- **Birnbeck Pier**
English Heritage grant aided phase of surveys and repairs to grade 2* listed cast and wrought iron pier
- **Mount Stewart House, NI**
£6m repairs, conservation and re-servicing of National Trust property to enable increased public access to the building.