



88 Albert Street
London Borough of Camden
NW1 7NR

Design and Access Statement including Heritage Statement



July 2015

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Note: site outlines may appear differently on some figures owing to distortions in historic maps. North is approximate on early maps.

Front Cover – MOLA 2015

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Executive summary

MOLA is commissioned to produce a design and access and heritage statement in support of listed building consent and planning application for works to the lower maisonette at 88 Albert Road in the London Borough of Camden. The scheme comprises internal works and the insertion of a French window in the rear elevation.

This desk-based study sets out the design and access issues and assesses the impact on built heritage assets (standing buildings). Although below ground heritage assets (historic structures) are not discussed in detail, they have been noted where they assist in the archaeological interpretation of the site. Built heritage assets that may be affected by the proposals comprise:

- **Nos 60 - 88 Albert Street:** a group of listed buildings (Grade II) dating to the 19th century and of high significance as a heritage asset;
- **Camden Town Conservation Area:** This CA was designated in 1986, reviewed in 1997 and appraised in 2006. It derives its high significance as a heritage asset from a diversity of high quality mostly C19th historic architecture and important historic town planning;
- **Nearby listed buildings:** a group of listed buildings, of high significance as heritage assets, on the other side of Albert Street (Nos.61 – 89)

The proposed development is not thought to impact adversely on the heritage significance of 88 Albert Street, which derives its heritage significance primarily from its group value. There is also thought to be no adverse impact on the Conservation Area or on the setting of nearby listed buildings and therefore, by extension, on the significance of any asset.

The proposed development is not thought to create any need for further archaeological investigation of the site in the form of standing building recording to mitigate any loss of historic fabric.

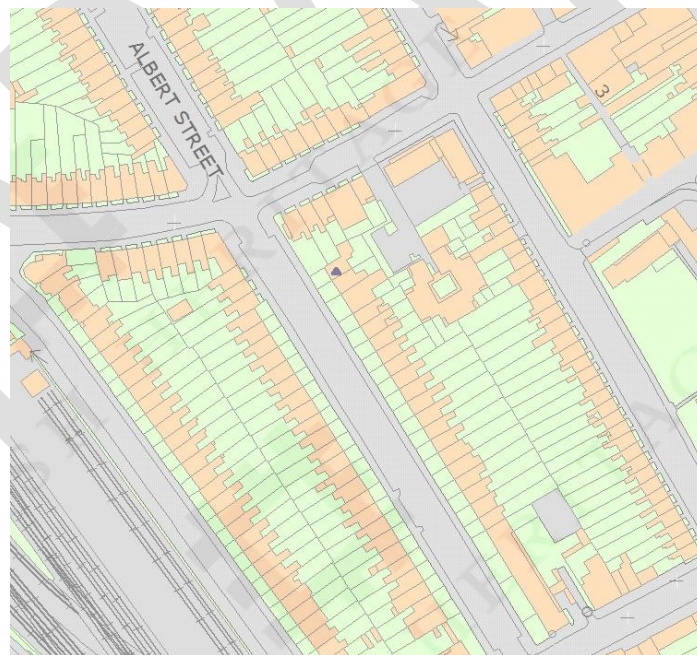


Fig 1 Site location¹ (Not to scale)

¹ OS Licence Number 100024900

1 Introduction

1.1 Origin and scope of the report

- 1.1.1 MOLA is commissioned to produce a design and access and heritage statement in support of a listed building consent and planning application for works to the lower maisonette at 88 Albert Road in the London Borough of Camden. The scheme comprises internal works and the insertion of a French window in the rear elevation.
- 1.1.2 This desk-based study sets out the design and access issues and assesses the impact of the scheme on built heritage assets (standing buildings). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or possible heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.3 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2012, 2014; see below) and to standards specified by the Institute for Archaeologists (IfA Oct 2012/Nov 2012), English Heritage (2008, 2011), the Institute and the Greater London Archaeological Advisory Service (GLAAS 2014), and the City of London (CoL 2004). Under the 'Copyright, Designs and Patents Act' 1988 MOLA retains the copyright to this document.
- 1.1.4 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author and MOLA, correct at the time of writing. Further archaeological investigation, more information about the nature of the present buildings, and/or more detailed proposals for redevelopment may require changes to all or parts of the document.

1.2 Designated heritage assets

- 1.2.1 The site is part of the Grade II listed group 50-88 Albert Street. The railings are included within the listing.
- 1.2.2 The site is within Camden Town Conservation Area.
- 1.2.3 It is notionally within the setting of the listed group 45 – 97 Albert Street. However, almost all of the 19th century residential buildings in the Conservation area are listed.

1.3 Aims and objectives

- 1.3.1 The aim of the report is to:
- Discuss design and access issues and relevant policy
 - identify the presence of any built heritage assets that may be affected by the proposals;
 - describe the significance of such assets, as required by national planning policy (see section 7 for planning framework and section 8 for methodology used to determine significance);
 - assess the likely impacts upon the significance of the assets arising from the proposals and seek to justify the work; and
 - provide recommendations.

2 History

2.1 Pre-planning

- 2.1.1 The residential parts of the Conservation Area are largely homogenous in scale and character, having been laid out within a period of three decades spanning the years 1820-1850. The western part of the Conservation Area comprises long residential terraces running in a north-south direction on a planned rectilinear grid (Mornington Terrace, Albert Street and Arlington Road) intersected by shorter terraces (Delancey Street and Mornington Street). A second pocket of residential development, originally made up of slightly grander terraces, falls south-east of the High Street (Harrington Square and Oakley Square).
- 2.1.2 The terrace 50 - 88 was built between 1844-48; the work of seven different builders, erected as three storey buildings raised on basements. No 88 is the northernmost end of the terrace.



Fig 2 Front Elevation (West) (MOLA March 2015)

- 2.1.3 The OS map of 1873 (Fig 3) shows the site with a range of outbuilding to the east, and the gardens of properties off Clancey Street to the north. Front and rear steps up into the 'ground' floor level are evident. The Park Chapel and school are shown, to the west.



Fig 3 Ordnance Survey map of 1873, 1:1056 series, not to scale



Fig 4 Ordnance Survey map of 1896, 1:2500 series, not to scale

2.1.4 The 1896 map is less detailed but indicates little change in form. Both plans show the whole of the east side of Albert Street as a terrace.

Fig 5

- 2.1.5 No bomb damage was sustained in Albert Street, the nearest bomb fall was recorded in Mornington Terrace. The contemporary map shows the workshops and Chapel/School replaced and nearby gardens reduced in size.



Fig 5 OS Plan Circa 2001(Not to scale)

- 2.1.6 The listing description is as follows:

ALBERT STREET 798-1/76/36 (East side) 14/05/74 Nos.50-88 (Even) and attached railings GV II

Irregular terrace of 20 houses. 1844-45. The following builders are known: Nos 50-60, probably George Bassett Jnr; Nos 62 & 64, J Tickner; Nos 66 & 68, J Burrows; Nos 70 & 72, J James; No.74, R Radbourn; No.76, AR Rogers; No.78, J Toleman; Nos 80-84, R Batterbury; No.86, JW Hudson. Yellow stock brick and rusticated stucco ground floors. EXTERIOR: 3 storeys and basements. Nos 60, 72, 74, 80-84, with penthouse additions. Nos 52, 68, 76, 78 & 86, slate mansard roofs with dormers. 2 windows each. Square-headed doorways, most with pilaster-jambs carrying cornice-heads; fanlights and panelled doors. Nos 70 & 72, panelled jambs and enriched console-brackets carrying palmette enriched frieze. Nos 86 & 88, enriched console-brackets carrying frieze. Recessed sashes, Nos 52-64, 68-72, & 78 with margin glazing to ground floors. Nos 80-88, tripartite ground floor sashes. Upper floors with architraved sashes (except Nos 84-88); 1st floors with console-bracketed cornices (except Nos 50 & 52). Cast-iron balconies to all 1st floor sashes. No.84 with slightly projecting window bays and parapet and brick dentil cornice. Nos 50-56, parapets. Nos 58-82 and 86 & 88, stucco cornice and blocking course (No.66, cornice cut back). INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings to areas and steps.

2.2 Planning

- 2.2.1 The site comprises an (originally 3; now 4 storey) townhouse with basement. Until circa 1985 the building was officially one dwelling. Various applications for different permutations of conversion schemes were made in 1985. (See Table 1). It is not entirely clear from the paperwork which of the many detailed changes were implemented; the 1989 approvals allowed conversion of the building into 2 maisonettes, with a single storey extension to the ground floor and the insertion of windows in the rear elevation. The 2010/2012 consents appear to have been implemented as approved.

Table 1

LPA Ref	Proposal	Decision	Date
8903012	Conversion of B & GF to s/c flats with extension	Refuse	03011989
8970401	Conversion G & B to 2 dwellings with link	Defer	03011989
8903594	Scheme A – 2 storey Rear Extension C/U to 2 maisonettes	Refuse	21091989
8903595	Scheme B – single storey Rear Extension C/U to 2 maisonettes	Approve	21091989
8970507	Scheme A (LBC)	Defer	21091989
8970508	Scheme B (LBC)	Approve	21091989
2010/6631/P 6633/L	& Mansard Roof Extension 2 dormer windows front and 2 rear New Stairs and Ensuite	Approve	10022010
2012/5112/L	Details pursuant to 2010/6633/L	Approve	28092012

2.2.2 Entrance to the maisonettes is via a shared lobby, with staircase off serving the upper unit. The figure below shows the floor plans and elevations as approved and apparently implemented circa 1985.



Fig 6 Ground, 1st and 2nd Floor Plans & Elevations prior to 2012 (Studio Architects ex LBoC website)

- 2.2.3 Listed Building and Planning consents for a dormer extension to the upstairs maisonette, with windows front and back, and internal alterations to facilitate, were granted in 2012.

The terrace

- 2.2.4 The terrace as a whole is built in the same materials, but all of the buildings show evidence of having been altered, extended, converted in many cases and repaired. Roof extensions to several are mentioned in the listing, and therefore significant works in some cases predate 1974.

2.3 Nearby heritage assets

Camden Town Conservation Area

2.3.1 Camden Town Conservation Area was designated in 1986, reviewed in 1997 and appraised in 2006.

2.3.2 The Conservation Area Appraisal of 2007 (LBoC) summarises the character as follows:

The Camden Town Conservation Area can be divided into two sub areas of distinctly different character, a busy commercial and retail area, and, a quieter more formal residential area.

The commercial sub area consists of a traditional wide shopping street linking the busy junction at Mornington Crescent to the eclectic and lively town centre at the heart of Camden Town. The focus of Camden Town is Britannia Junction which acts as a hub and an important interchange, with busy, noisy, dynamic and diverse characteristics. This retail and commercial area is powerfully urban in character with few openings between the continuous building lines and an absence of public open spaces and soft landscaping. Within this part of the Conservation Area there are two underground stations, an array of banks, restaurants, street markets, shops and stalls, signs and vehicles all existing within an historic architectural streetscape. The buildings reflect the diverse and changing architectural styles over the last two hundred years. Terraces of flat fronted early to mid 19th century houses now fronted by shops, mid Victorian stucco terraces, Victorian Gothic buildings, late Victorian and Edwardian red brick parades four and five storeys high with decorative gables, imposing banks, places of entertainment and public houses occupying key focal sites, and 20th century buildings all contribute to the wide ranging variety of architectural styles.

To the east, the backs of the retail premises on Camden High Street are accessed by cobbled mews which today are still largely in commercial use. Beyond the commercial interests are areas of late 18th and early 19th century residential development while to the west of the High Street narrow passage-ways link through to quiet tree lined streets forming the residential sub area. These streets of stock brick and stucco terraces date from the early to mid 19th century and are more consistent in character, and are in marked contrast to the dynamic, busy commercial frontages.

The Conservation Area has a high proportion of 19th century buildings both listed and unlisted, which make a positive contribution to the historic character and appearance of the Conservation Area. There is an overall 19th century architectural and historic character and appearance throughout.

2.3.3 The residential sub-area (N0.2) states that:

The residential parts of the Conservation Area are largely homogenous in scale and character, having been laid out within a period of three decades spanning the years 1820-1850. The western part of the Conservation Area comprises long residential terraces running in a north-south direction on a planned rectilinear grid (Mornington Terrace, Albert Street and Arlington Road) intersected by shorter terraces (Delancey Street and Mornington Street). A second pocket of residential development, originally made up of slightly grander terraces, falls south-east of the High Street (Harrington Square and Oakley Square). The area contains a large number of good examples of early/mid 19th century speculatively built terraced London houses, generally of a uniform appearance, and many statutorily listed for their special interest.

2.3.4 Albert Street is described thus:

Albert Street has a high quality streetscape. Lined on both sides almost without interruption by uniform historic terraces, it is wider than nearby streets, creating a sense of space. There are a large number of street trees, complemented by planting in the generous front gardens, which south of Delancey Street are as much as 5 metres deep.

The finely detailed brick and stucco terraces were built in most part by George Bassett, surveyor to the Southampton Estate, in the years 1844-48. However, the terrace on the east side, Nos 50-88, of an equally homogenous appearance, was the work of seven different builders. The majority of terraces were erected as three storey buildings raised on basements. The terrace on the east side, south of Mornington Street, Nos 22-46, is of a symmetrical composition with a raised parapet forming a central feature spanning Nos 34-38. It is the only terrace in the street with an historic mansard attic storey.

A large proportion of the houses in Albert Street survive as single family dwellings. Although

the architectural integrity of the terraces has been retained at the front, glimpses from side streets reveal an array of oversized and out-of-scale rear extensions, many of which were constructed under permitted development rights prior to the statutory listing of properties and the designation of the Conservation Area. Similarly, several properties have inappropriate roof extensions, partially visible above the front eaves parapets, ranging from oversized mansards and dormer windows to flat roofed accommodation set behind front roof terraces.



Fig 7 Conservation Area Boundary and Summary (LBoC 2007)

3 Condition and Significance

3.1 Statement of significance

3.1.1 The terrace numbered 50 – 88 Albert Street is listed at Grade II.

3.1.2 The terrace is of **high significance** as a heritage asset. As such, it has historical, evidential, aesthetic and communal values as follows:

Historical value: The terrace relates to other buildings

Evidential value: The buildings of the terrace provide evidence of early 19th century architectural design and some evidence of historic fabric.

Aesthetic value: The buildings of the terrace provide a view of a set of late-Georgian block frontages, especially when viewed in context with the terrace opposite.

Communal value: The buildings of the terrace are an important part of the interrelation with other nearby buildings and the wider Conservation Area.

3.1.3 Internally, the limited survival of details at lower levels and the intervention occasioned by C20/C21st works in combination have resulted in a minor negative impact the significance of the asset.

Conservation Area

3.1.4 The Conservation Area is of **high significance** as a heritage asset. The listed terrace of which the site is a part makes a positive contribution to the character of the Conservation Area and the setting relationship between the two can be considered to be of **high significance**.

Nearby listed buildings

3.1.5 The terrace of nearby listed buildings (Grade II) and is considered to be of **high significance** as a heritage asset.

4 Proposed Development – Design and Access

4.1 Overview of proposed development

4.1.1 Works are required to rationalise and maximise the internal space and layout and therefore the usability of the maisonette to its full potential for contemporary living.

4.1.2 The proposed development is internal in the main; it comprises:

Floor	Detail	Impact on significance
Basement	Insertion of stud walls to compartmentalise Create bathroom and ensuite Remove chimneybreast Increase usability of stairs and improve room arrangements Improve circulation	
Groundfloor	Reorganisation to permit beneficial use Open up chimney breast in kitchen area to accommodate cooker and extraction Insertion of 'French' window in place of rear window to facilitate access to the garden	
General	Making good and redecoration Repair garden wall	

4.1.3 The 2 floors have been the subject of much alteration through time, some of it less than sympathetic, and the layout is considered to be inefficient in the use of space. The resultant arrangement does not readily reflect the historic layout anymore. There were few details to start off with, and what there were have long been removed. The staircase has been altered in terms of alignment.

4.1.4 The rather thrown together nature of the resultant living area, achieved through a series of various minor alterations, makes the actual use of the space impracticable.

4.1.5 The rear elevation has been altered considerably at the lower levels, including rebuilding and alterations to the fenestration at the time of the conversion to 2 units (see above). It is not clear how much of the fabric around the lower floor windows is actually original.

4.1.6 Please see application plans for details.

4.2 Access and Accessibility

4.2.1 The location is sustainable. The proposed work will not affect this situation, nor will it improve or reduce the accessibility of the place or the building. The impact will be neutral.

5 Impact of Proposed Development

5.1 The site

- 5.1.1 The conversion and later works have all been deemed to be acceptable in terms of impact. The cumulative impact is also considered to have been acceptable. There is nothing to suggest a 'tipping point' has been reached at this juncture in the life of the building. The internal works are considered therefore to be part of this development and to have at worst a negligible impact on the significance of the terrace as a heritage asset.
- 5.1.2 The new window will have a negligible impact on the significance of the terrace as a historic asset. There will be minimal impact on original fabric.

5.2 Conservation Area

- 5.2.1 The proposals will have no impact on the character and appearance of the Conservation Area.

5.3 Other nearby heritage assets

- 5.3.1 The proposals will have no impact on the setting of other listed buildings and will therefore not affect the significance of those asset.

6 Conclusions and Recommendations

6.1 Conclusions

- 6.1.1 The proposed development will have negligible impact on the significance of the heritage asset, and a neutral impact on access and accessibility.
- 6.1.2 The proposal accords with national and local policy.

6.2 Recommendations

- 6.2.1 It is recommended that the scheme be approved.
- 6.2.2 Due to the relatively low level of value of the building's interior, no further archaeological work (standing building recording) is thought to be necessary to mitigate the negligible impacts.

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7 Planning framework

7.1 Statutory protection

Listed Buildings and Conservation Areas

- 7.1.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

7.2 World Heritage Site

- 7.2.1 World Heritage Sites (sites deemed to be of ‘outstanding universal value’) are not statutorily designated and so no planning issues arise directly from them. However, it can be assumed that local planning authorities will recognise the importance of the designation.
- 7.2.2 Planning and development within and around World Heritage Sites is discussed in English Heritage’s *The Protection and Management of World Heritage Sites in England* (2009) and in *London’s World Heritage Sites – Guidance on Settings: Supplementary Planning Guidance* (Mayor of London, 2012).
- 7.2.3 *London’s World Heritage Sites* contains the following:
- 1.4 The setting of heritage assets, including World Heritage Sites, is included in the London Plan 2011 as follows:
“Setting is the surroundings within which an 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.
 - 1.5 Policy 7.10 of the London Plan 2011 seeks to conserve, promote, make sustainable and enhance World Heritage Sites and their settings, and states that development should not cause adverse impacts on World Heritage Sites of their settings, and should not compromise their Outstanding Universal Value, Integrity, Authenticity or Significance.
- 7.2.4 The site is also covered by the *Maritime Greenwich World Heritage Site Management Plan (Third Review 2013)* which lays out the Statement of Outstanding Universal Value for the site.

7.3 National Planning Policy Framework

- 7.3.1 The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to ‘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’ (DCLG 2012 para 17). It recognises that heritage assets are an irreplaceable resource (para 126), and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be taken into account (para 128). The NPPF encourages early engagement (i.e. pre-application) as this has significant potential to improve the efficiency and effectiveness of a planning application and can lead to better outcomes for the local community (para 188).
- 7.3.2 NPPF Section 12: Conserving and enhancing the historic environment, is produced in full below:

Para 126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at

risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are 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.

Para 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.

Para 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 assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Para 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.

Para 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.

Para 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.

Para 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.

Para 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
- the harm or loss is outweighed by the benefit of bringing the site back into use.

Para 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.

Para 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 judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Para 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.

Para 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.

Para 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.

Para 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.

Para 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.

Para 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. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

7.4 Greater London regional policy

The London Plan

7.4.1 The overarching strategies and policies for the whole of the Greater London area are contained within the London Plan of the Greater London Authority (GLA July 2011). Policy 7.8 relates to Heritage Assets and Archaeology:

A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

F. Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G. Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

- 7.4.2 As part of the *Revised Early Minor Alterations to the London Plan* (GLA Oct 2013), amended paragraph 7.31 supporting Policy 7.8 'Heritage Assets and Archaeology' adds that '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. Enabling development that would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.' It further adds 'Where there is evidence of deliberate neglect of and or damage to a heritage asset the deteriorated state of that asset should not be taken into account when making a decision on a development proposal'. The Draft Further Alterations to the London Plan (GLA Jan 2014), incorporate the changes made to paragraph 7.31 but add no further revisions to the elements of the London Plan relating to archaeology and heritage.

7.5 Local planning policy

- 7.5.1 Following the Planning and Compulsory Purchase Act 2004, Planning Authorities have replaced their Unitary Development Plans, Local Plans and Supplementary Planning Guidance with a new system of Local Development Frameworks (LDFs). UDP policies are either 'saved' or 'deleted'. In most cases archaeology policies are likely to be 'saved' because there have been no significant changes in legislation or advice at a national level.

- 7.5.2 In previous applications the LPA have referred to the following:

Local Development Framework (LDF) Core Strategy and Development Policies:

CS4-Areas of more limited change

CS14-Promoting high quality places and conserving our heritage

DP24-Securing high quality design

DP25-Conserving Camden's heritage

DP26-Managing the impact of development on occupiers and neighbours

Camden Planning Guidance December 2006

Camden Town Conservation Area Appraisal, adopted 2007

Commentary

- 7.5.3 The proposals accord with National and Regional policy and advice.
- 7.5.4 In as much as the policies are still relevant, in the light of NPPF/NPPG and emerging alterations to the LDF, it is considered that the proposals accord with the spirit and content of local policy.
- 7.5.5 As such, a presumption in favour of the development is claimed.

8 Determining significance

8.1.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes 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, and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):

- *Evidential value*: the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
- *Aesthetic value*: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
- *Historical value*: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
- *Communal value*: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.

8.1.2 Table 1 gives examples of the significance of designated and non-designated heritage assets.

Table 1: Significance of heritage assets

Heritage asset description	Significance
World heritage sites Scheduled monuments Grade I and II* listed buildings English Heritage Grade I and II* registered parks and gardens Protected Wrecks Heritage assets of national importance	Very high (International/ national)
English Heritage Grade II registered parks and gardens Conservation areas Designated historic battlefields Grade II listed buildings Burial grounds Protected heritage landscapes (e.g. ancient woodland or historic hedgerows) Heritage assets of regional or county importance	High (national/ regional/ county)
Heritage assets with a district value or interest for education or cultural appreciation Locally listed buildings	Medium (District)
Heritage assets with a local (i.e. parish) value or interest for education or cultural appreciation	Low (Local)
Historic environment resource with no significant value or interest	Negligible
Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined	Uncertain

8.1.3 Unless the nature and exact extent of buried archaeological remains within any given area has been determined through prior investigation, significance is often uncertain.