

24 Heath Drive
London NW3 7SB

Heritage Appraisal

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Consultancy for the
Historic Built Environment

KMIHeritage

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1 Introduction

- 1.1 This report has been prepared to support an application for planning permission and listed building consent for alterations to No. 24 Heath Drive, NW3 7SB.

Purpose

- 1.2 The purpose of the report is to assess the proposed alterations to No. 24 Heath Drive against national and local policies and guidance relating to the historic built environment.
- 1.3 This report should be read in conjunction with the drawings and Design & Access Statement prepared by Kyson Architects, along with other application material.

Nomenclature

- 1.4 24 Heath Drive is referred to as 'the site' or 'the listed building' throughout this report'. Rooms within the house are referred using the same names as found on the proposed architectural drawings.
- 1.5 In 2015 English Heritage changed its name to 'Historic England' and a new charity, officially called the English Heritage Trust, took the name of English Heritage and responsibility for managing the National Heritage Collection of more than 400 state-owned historic sites and monuments across England. In this report reference is made both to 'English Heritage' and 'Historic England'.

Organisation

- 1.6 This introduction is followed by a description of 24 Heath Drive and its context, and an analysis of the heritage and townscape significance of the property. There is an outline in Section 3 of the national and local policy and guidance that is relevant to this matter. Section 4 analyses the proposed scheme and its effects on heritage significance. Section 5 assesses the proposed development against policy and guidance. Section 6 is a conclusion. There is one appendix.

Author

- 1.7 The lead author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark, and was Head of Conservation

and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect, and has a specialist qualification in urban and building conservation. Kevin Murphy was included for a number of years on the Heritage Lottery Fund's Directory of Expert Advisers.

- 1.8 Historical research for this report was carried out by Dr. Ann Robey FSA, a conservation and heritage professional with over 20 years' experience. She has worked for leading national bodies as well as smaller local organizations and charities. She is a researcher and writer specialising in architectural, social and economic history, with a publication record that includes books, articles, exhibitions and collaborative research.
- 1.9 Analysis and drafting for this report was undertaken by Anne Roache M.A. Anne is a researcher with over 25 years experience. She has worked for leading commercial organizations in the fields of property, planning and law. Alongside a specialisation in the archaeology, architectural and social history of London, Anne is also a qualified field ecologist.

2 The site and its context

- 2.1 This section of the report briefly describes the history and development of No. 24 Heath Drive and its surroundings, and provides an assessment of their heritage and townscape significance.
- 2.2 Heath Drive is situated in the Hampstead area of the London Borough of Camden. It is a residential street and runs north east from Finchley Road towards Hampstead Heath.
- 2.3 The property - No. 24 Heath Drive - is a double-fronted, three-storey house (with basement, attics and garden) built in 1907 in the Neo-Georgian style. It is situated in the Redington/Froggnal Conservation Area and is Grade II Listed.

History and development of Heath Drive area

- 2.4 In the early 19th century much of this part of Hampstead was farmland owned by the Maryon Wilson family. In 1829 Thomas Maryon Wilson became embroiled in an unsuccessful battle to develop parts of his 365 acres to the west of Hampstead village and, more controversially, on parts of Hampstead Heath. His attempts to build on the Heath precipitated a legal battle to protect common land all over London and in effect prevented the development, in the first half of the 19th century, of his other lands in Hampstead which included the land on which Heath Drive and the adjacent Redington Road were eventually built.¹
- 2.5 After the death of Thomas Maryon Wilson in 1869, the family gave up attempts to build on the land they owned on the Heath and, in 1872, sold the land to the Metropolitan Board of Works (MBW) preserving it as open land in perpetuity. The embargo on developing the family's other lands north of Belsize Park was lifted thereby enabling these to be sold off in parcels to speculators and builders.
- 2.6 The Ordnance Survey map surveyed 1864-65 shows the area between Finchley Road and Hampstead village as largely given over to fields (fig.1).² By 1895, the area had started to develop and Heath Drive, running in a shallow valley to the south-west of Redington Road linking it to Finchley Road, had been laid out.³ As more plots were sold off, development in and around Heath Drive

¹ Cherry, B. and Pevsner, N. (2001). *The Buildings of England*, London 4: North p. 230.

² OS Middlesex XI (includes: Hendon; Wembley; Willesden.) Surveyed: 1864 to 1865; Published: 1873.

³ Heath Drive was known, in 1899, as West Hampstead Avenue.

accelerated with development continuing throughout the Edwardian era and into the Interwar period.



Figure 1: OS Map showing early development in the Heath Drive area (Surveyed: 1864 to 1865)

- 2.7 The main influencers shaping what was to become known as the 'Hampstead Manor Estate' were the builder and developer George Washington Hart and his partner, the architect, Charles Quennell. From 1904 onwards, they built stretches of Redington Road and Heath Drive, before spreading into Oakhill Avenue and one side of Kidderpore Gardens in 1906, taking on more plots in these roads in 1907-9.⁴ In total 20 houses and a block of flats, most of which were designed by Quennell, were built there between 1897 and 1900, with another four between 1905 and 1907, which included No. 24 Heath Drive.⁵
- 2.8 Quennell had begun work on the first houses of this part of Hampstead in 1896 and continued to do so until 1914.⁶ He was also active within other affluent London suburbs.⁶ Adopting a variety of styles ranging from restrained Arts and Crafts to more formal Neo-Georgian, he used rich red and soft orange brickwork, clay roof tiles, and occasional areas of tile hanging and render, gables, and bay and dormer windows. Quennell was also a prolific author and in 1906 published *Modern Suburban Houses*, illustrated with plans and photographs of some of his properties

⁴ Hart had a house at No. 20 Redington Road built for him, designed by Quennell.

⁵ Baker, T.F.T. *et al.*, (1989). 'Hampstead: Frognaal and the Central Demesne', in *A History of the County of Middlesex: Volume 9, Hampstead, Paddington, Elrington*, C.R. (ed.) (London, 1989), pp. 33-42.

⁶ Quennell also worked as part of the team on Hampstead Garden Suburb and designed 16 houses before and after the war in the area.

along the north end of Heath Drive, although not No. 24 which was as yet unbuilt.⁷ In his book, Quennell offered a series of fifteen ‘types’, taken from his own works, as a guide to best practice.⁸

- 2.9 The 1915 Ordnance Survey map shows that Heath Drive had, by this time, been largely developed with properties now lining both sides of the street, especially to the north of Kidderpore Avenue (fig. 2).

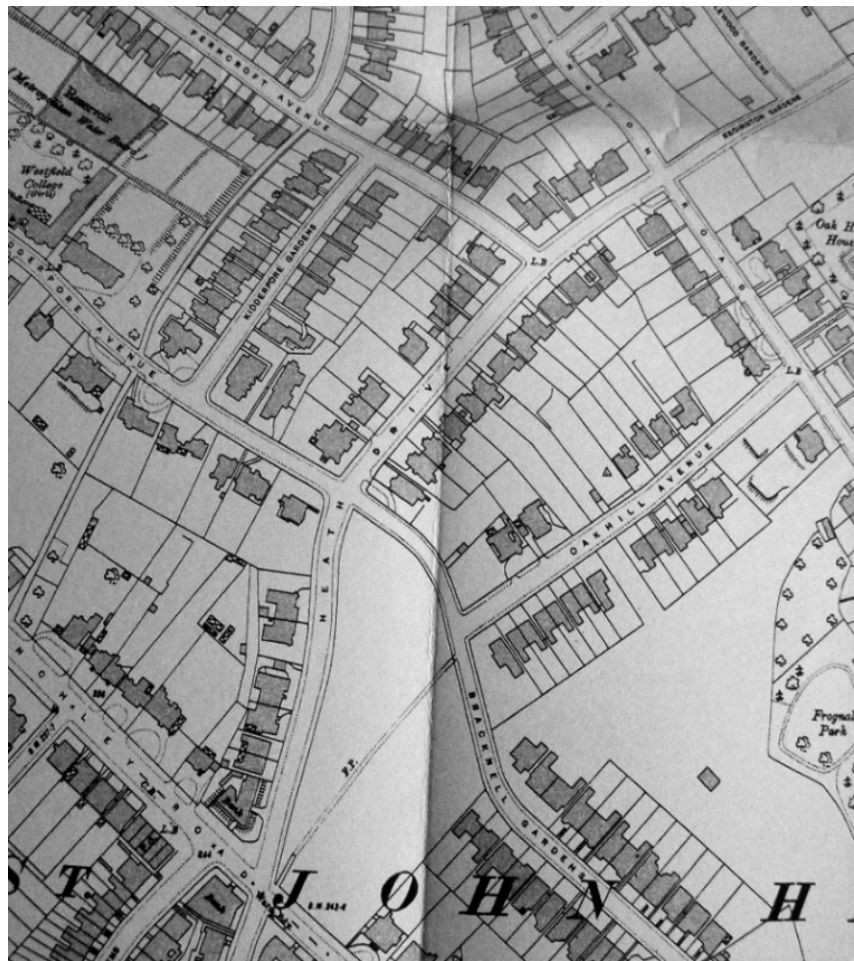


Figure 2: 1915 OS Map showing early development in the Heath Drive area

- 2.10 Today, the Redington/Froggnal Conservation Area forms a well-preserved example of a prosperous late 19th century and Edwardian residential suburb. The houses - a mix of detached and semi-detached - are predominantly large (some have been converted into flats) and display a variety of formal and free architectural styles typical of the

⁷ Quennell, C.H.B., (1906). *Modern Suburban Houses: A Series of examples Erected at Hampstead & Elsewhere, From Designs by C. H. B. Quennell, Architect.*

⁸ McKellar, E., (2007). 'C. H. B. Quennell (1872-1935): Architecture, History and the Quest for the Modern', *Architectural History*, Vol. 50 (2007), pp. 211-246.

years at the turn of the 19th century to early 20th century but are generally built in red brick with clay tiles and with small-paned windows with white painted frames. Heath Drive took many years to complete, and has no one distinctive architectural style but it is however pleasingly harmonious and is described in Pevsner as ‘pleasantly leafy’.⁹

- 2.11 The conservation area was designated in 1985. The committee report prepared by the council at the time of designation stated that the conservation area was ‘an exceptional example of consistently distinguished Victorian and Edwardian architecture.’

The House: No. 24 Heath Drive

- 2.12 No. 24 Heath Drive (fig. 3) was built in 1907 by George Hart, to the designs of Charles Quennell. It is part of a run of twelve houses - Nos. 22-33 - that were designed and built by the partnership between 1905 and 1907 and which have been described as ‘the peak of Quennell’s hundred or more Edwardian designs in Hampstead’.¹⁰ A number of these houses are Grade II listed including Nos. 24-26 and Nos. 31-33 Heath Drive.
- 2.13 Neo-Georgian in style, No. 24 has been described as a ‘gem of a house’.¹¹ Fronted by a carriage drive, it is detached and double-fronted, with ‘especially pretty ground floor windows’.¹² Quennell wrote of the importance of keeping a building simple, and articulating it with a few well-considered and well-crafted details. This is evident at No. 24 with its subtle quoins, eaves details and tall chimneys. Despite a later two-storey garage extension which spoils the original symmetry of the house, it remains an imposing structure.
- 2.14 As Hart was building on previously agricultural land in order to create the new Hampstead Manor Estate, the land had most likely already been cleared of very large trees and so the new houses would have enjoyed a more open garden aspect than might be experienced today by many of its households. The garden of No. 24 is over 200 feet long and is home to mature trees and shrubs.

⁹ Cherry, B. and Pevsner, N. (2001). *The Buildings of England, London 4: North* (2001), p.232.

¹⁰ Service, A (1989). *Victorian and Edwardian Hampstead*, p. 63.

¹¹ *Ibid.*

¹² *Ibid.*



Figure 3: No. 24 Heath Drive, Front (North West) Elevation (2016)

- 2.15 Little evidence of changes to the house over the years has been found in either the drainage plan records or in Camden's historic planning records.¹³ In 1913, a new WC was put into the first floor in an existing bathroom and a new basin installed in the adjoining bedroom.¹⁴ In 1951 when the house was advertised for sale in *The Times* it was described as 'A distinctive Detached and Double Fronted House of pleasing elevation and modern construction'. The advert noted the 'parquet floors, central heating, fixed wash basins; 7 or 8 bedrooms, dressing room, 3 bathrooms, 3 reception rooms and a square hall'. In addition, there was a maids' sitting room.¹⁵ The garage noted at the property is likely to have been built in the inter-war period. However, the nature and quality of the internal decoration in the large rear living room suggests that in contrast to the early/original internal nature of the front rooms, it is likely that this part of the house was altered in the 1950s or later. The bay window in this room is not particularly consistent with the Art & Crafts style of the house as whole and is in very poor condition. Elsewhere in the house – in the kitchen and in upstairs rooms, there is also evidence of post-war alteration and change. Changes are particularly evident in and around the chimney breast in the kitchen where asymmetries

¹³ The drainage plan records for Heath Drive are incorrectly numbered and as yet few have been found for the existing building at No. 24.

¹⁴ Camden Local Studies and Archives Centre, drainage plan microfiche (1913).

¹⁵ The Times online 15 October 1951.

suggest significant alterations and in upstairs rooms (please refer to figure 7).

2.16 In 1972, the then owner of the house Mrs S Hay commissioned the architects Rottenberg Associates of Gloucester Avenue to draw up plans to convert the house into four residential flats and to add a rear extension at first floor level and build a side staircase. By that time the garage extension with a bathroom above had been built.¹⁶ Permission was granted in September 1972 and in July 1977 the consent was renewed to Mr S. Hay.¹⁷ No work was ever carried out however and the house remained as a family residence. The house was listed Grade II in 1999 (see below).

2.17 In Quennell's 1906 publication, *Modern Suburban Houses*, he emphasised the importance of good internal planning and on providing a practical and comfortable home. One of the things he disliked was dark basement kitchens and so he recommended light kitchens and light living rooms.¹⁸ The many windows on both the front and rear of No. 24 Heath Drive (including a large dormer window) bear testimony to this preference (fig. 4). Despite this, and due to the extensive overgrown garden, the house currently can be dark inside requiring artificial lighting during the daytime (figs. 5-7).



Figure 4: No. 24 Heath Drive, Rear (South East) Elevation, 2016

¹⁶ Camden Planning files online E5/8/13 14246.

¹⁷ Camden Planning files online E5/8/13 24913.

¹⁸ *Op. cit.* Quennell, (1906).



Figure 5: The hallway, 2016



Figure 6: The living room with bay overlooking the garden, 2016



Figure 7: The kitchen (2016)

The heritage context of 24 Heath Drive

Listed buildings

- 2.18 No 24. Heath Drive is listed Grade II under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest. It was listed on 11 January 1999.¹⁹ The listing reads:
 ‘Detached house. 1907. By C.H.B. Quennell. Red brick. Tall tiled roof, hipped with central gable to front facade; return gabled roofs with tall brick chimney-stacks; overhanging eaves with painted timber soffits. Symmetrical design. 2 storeys, 5 windows. Central gabled entrance bay with rusticated brick pilasters terminating in enriched console brackets supporting on each side a short continuation of the eaves to appear as a broken pediment. Entrance with porch of 2 columns supporting an entablature with projecting cornice; recessed doorway with panelled door, sidelights and overlight having diaper glazing. Above, a flush framed sash with exposed boxing having a segmental-arched stuccoed head with carved festoon enrichment. Outer bays each with 2 similar sashes at ground floor but with louvred shutters and no enrichment to segmental heads. 1st floor, each bay with 2 flush framed sashes.’
- 2.19 There is a total of six listed buildings on Heath Drive, all of which were designed by Charles Quennell. They are: Nos. 24, 25 & 26 (1907) and Nos. 31, 32 & 33(1905).
- The Redington/Frogna Conservation Area
- 2.20 Heath Drive is located in the Redington/Frogna Conservation Area, Sub Area 5: Heath Drive and its Environs. The conservation area was first designated in 1985 (subsequently extended in 1988 and 2002). The current conservation area appraisal was adopted by the London Borough of Camden in January 2003. The Redington/Frogna Conservation Area is immediately adjacent to the Hampstead, West End Green and Fitzjohns Netherhall Conservation Areas.
- 2.21 No. 24 Heath Drive is identified as making a positive contribution to the conservation area as part of the group of Quennell houses which ‘form an impressive and coherent group’. The trees and hedges of Heath Drive are also judged to make a positive contribution to the Conservation Area. Those trees that are judged to make a positive contribution to the Conservation are London Planes.
- 2.22 The Conservation Area Statement explains: ‘The distinct quality of the Redington/Frogna Conservation Area is that it largely retains its homogenous late 19th/early 20th

¹⁹ Historic England List entry number: 1378821

century architectural character. For this reason, most of the buildings make a positive contribution to the character and appearance of the Conservation Area and the general presumption should therefore be in favour of retaining such buildings’.

- 2.23 In Heath Drive those non-listed buildings adjudged to be making a positive contribution are: Nos. 1-10 (cons), 10A, 11, 11A, 12-14 (cons), 16-20 (cons), 22, 23, 27-30 (cons), 35-38 (cons).

Heritage significance

Assessing heritage significance: definitions

- 2.24 The listed buildings and the conservation area are ‘designated heritage assets’, as defined by the National Planning Policy Framework (NPPF). Locally listed buildings or features are ‘non-designated heritage assets’.
- 2.25 Heritage ‘significance’ is defined in the NPPF as ‘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’. The Historic England ‘Historic Environment Good Practice Advice in Planning Note 2’ puts it slightly differently – as ‘the sum of its architectural, historic, artistic or archaeological interest’.
- 2.26 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.

The relevant heritage assets

- 2.27 In terms of the assessment of the proposals for No. 24 Heath Drive, the heritage assets most relevant to considering the effect of the scheme are 24 Heath Drive itself, the Redington/Frogna Conservation Area and nearby listed buildings.
- ‘Historic interest’, ‘Historical value’ and ‘Evidential value’
- 2.28 In terms of English Heritage’s ‘Conservation Principles’ the buildings of Heath Drive and the Redington/Frogna Conservation Area provide us with ‘evidence about past human activity’ and, by means of their fabric, design and appearance, communicate information about its past. Subsequent alteration and development in the area has not removed the ability of the older townscape and intact historic buildings to do this; the Redington/Frogna Conservation Area and its buildings clearly retain sufficient historic character and appearance to convey the area’s historical ethos. Despite changes over time, the significant buildings - whether statutorily listed or unlisted buildings

- that make a positive contribution to the conservation area - retain their ability to convey this historical value.
- 2.29 The listed and unlisted buildings in Heath Drive and their relationship to one another and the Redington/Frogna Conservation Area collectively illustrate the development of this part of London. They evoke, by their design and appearance, the history that is set out earlier in this report, and that history implicitly indicates a high level of historical significance. They tell us about the nature of the suburban expansion of London from the 19th century onwards and the transformation of countryside to townscape during the period. The area and its buildings are a record of social and economic change and lifestyles in various periods and illustrate the effect that these things had on the historic building stock and urban grain.
- 2.30 The area surrounding No. 24 Heath Drive therefore has substantial historic, evidential and communal value ('Conservation Principles') for a variety of historical, architectural and urban design reasons. As a listed building No. 24 possesses these values to a high degree and has a clear place in the historical evolution of the local area. The contributing elements of the aesthetic significance of the area as a piece of historic townscape are the nature of older (listed and unlisted) structures and their contribution to the historic streetscape, and that streetscape itself.
- 'Architectural interest', 'artistic interest' or 'aesthetic value'
- 2.31 It is clear that the Redington/Frogna Conservation Area, the listed buildings and the unlisted buildings of merit referred to above have - in varying degrees - 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'.
- 2.32 The special architectural interest of No. 24 Heath Drive is high. Designed by the architect, Charles Quennell and executed by the builder and developer George Washington Hart, to a Neo-Georgian design, it is typical of the large, high quality family residences of this period that are found in this part of north-west London. As well as being listed, and thus inherently possessing special architectural or historic interest, it makes a positive contribution to the Redington/Frogna Conservation Area. It represents a very good example of suburban domestic architecture for its period, and was designed by an important architect for that period and executed by a

builder with a firm reputation, both men being responsible for many good buildings in the local area.

- 2.33 The hierarchy of the house, in terms of plan form and decoration, is familiar – the ground and first floor contain the principal rooms whilst the basement and second floor are clearly of lesser significance.

The exterior

- 2.34 The principal elevation of 24 Heath Drive, facing the street, is, essentially, original in fabric and appearance, save for the clumsy introduction of the garage and the bathroom over the garage, which unbalances an elevation whose symmetry is one of its main qualities. It is a formal frontage of two storeys and five bays beneath a tiled pitched roof. The central entrance bay is gabled at roof level, with rusticated brick pilasters terminating in console brackets supporting on each side a continuation of the eaves to appear as a broken pediment. The entrance is a porch with two Tuscan columns supporting an entablature with projecting cornice. The ground floor windows having semi-circular arches with plain rendered tympanae.

- 2.35 The rear elevation is, as would be expected, more informal, with the kitchen wing projecting forward of the rest of the house, and a dormer on the main rear roof slope. The bay is evidently a later addition, inconsistent in appearance with the overall design of the house and of much poorer construction quality. The laundry room addition on the left is of better quality, but does not relate well to the overall massing of the house.
- 2.36 The side elevations are simply utilitarian. That to the south contains the large stairs window, which is obviously of significance, whereas the small court and passageway area on the northern side behind the garage are plain and functional in design and fabric.

The interior

- 2.37 The interior of 24 Heath Drive possesses considerable heritage significance (or special architectural or historic interest), both in terms of plan layout and in terms of surviving architectural quality. The original or early plan layout of the house survives in the main part of the house at ground, first and second floor levels. However, the layout – and massing – of the house was altered by the insensitive additions of the bathroom added over the garage (itself added in the inter-war period) and the clearly later and poor-quality bay window to the rear. While muted in appearance and not incongruous in style, the laundry room adjacent to the kitchen also appears to have been added after the main house.

2.38 Regarding internal architectural treatment, the most authentic parts of the house are the ground floor hall, front reception rooms and the stairs, and the main landing at first floor, where what appears to be the original arts and crafts (or Queen Anne) treatment survives. Elsewhere in the house - in the kitchen, adjoining areas, rear bay window and in upstairs rooms - there is evidence of inter and post-war alteration and change.

The ground floor

2.39 The two reception rooms ('Study' and 'Family Room') possess what appears to be largely original panelling and decorative features - skirting and architraving, plaster cornices and fireplaces, as well as specific decorative features such as swags and cherubs in the Family Room, albeit with the curious pelmet feature over the fire place in the Study. There is an interesting variation in stylistic approach between these two rooms - the Family Room is given a dentilled early-mid Georgian box cornice, whereas the Study has a flatter and more elongated cornice and frieze that is typical of the later Georgian and Regency periods. This illustrates the degree of flexibility and choice within Edwardian architectural practice, and the ability of designers such as Quennell to draw upon a variety of periods in their work.

2.40 The nature and quality of the internal decoration in the large rear Living Room suggests that it is likely that - in contrast to the early/original internal nature of the front rooms - this part of the house was altered in the 1950s or afterwards. As indicated above, the bay window in this room is not particularly consistent with the Art & Crafts style of the house as a whole and is in very poor condition. The quality of the Living Room decoration and features is not high - it could be described as, at best, a fairly pedestrian interpretation of 'neo-Georgian' popular for some time after the Second World War, but of which far better examples exist (such as at 138 Park Lane in Westminster, listed Grade II).

2.41 The hall and stairs form a centrepiece to the house at ground floor, with panelling and plasterwork detail of a high standard, and the stairs (its balustrading and wainscoting) is particularly fine in terms of its making and decorative quality.

2.42 While forming part of the original layout of the listed building, the kitchen and adjacent spaces between the Family Room and the kitchen are inherently lesser in significance compared to the hall and reception rooms, both formally and in the quality of their fabric. This area, and in particular the kitchen and pantry fixture and fittings appear to be mid- or late-20th century in their

fabric and, in any event, are of poor quality and in many instances damaged by use.

The basement

- 2.43 The basement is a purely utilitarian space without any notable features beyond coal drop paraphernalia that could be reused in the proposed scheme. The basement was intended to be a service zone of the house, used for storage, etc., and while that in itself has significance, the basement area is not so sensitive that change cannot be proposed.

First floor

- 2.44 The first floor layout appears - apart from the addition of a bathroom over the garage and its connection to Bedroom 3 - largely original. Bedroom 1 has later (possibly 1950s) cupboards and no fireplace (replaced by shelving); Bedroom 2 and the Master Bedroom have fireplaces consistent with the original period of the building, and Bedroom 3 has an evidently later fireplace similar in style to the fittings of the bathroom over the garage. The hall, each bedroom and the dressing room between Bedrooms 2 and 3 retains early or original joinery and plasterwork, of a much simpler and plainer style and appearance when compared with the ground floor - as would be expected in a house such as 24 Heath Drive. Overlain on this in Bedroom 3 is a rather inept attempt to 'modernise' the appearance of the bedroom, possibly undertaken at the same time as the creation of the bathroom over the garage, or later. Here, mouldings have been applied to the wall to the dressing room, and the two pre-existing doors to the room (from hall and dressing room) replaced. The bathroom and WC have modern fittings, and the cupboards in the dressing room and opposite the stairs to second floor are relatively generic in their detail and fabrication.

The second floor

- 2.45 The second floor was almost certainly used for servant accommodation and storage, and is utilitarian and unremarkable in its layout, decoration and fabric. A substantial portion of the second floor level consists of roof void. There are no features of note; existing bathroom fittings are modern.

3 The legislative and policy context

Introduction

- 3.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.
- 3.2 Section 5 demonstrates how the proposed development complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 5: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surrounding, and in reaching conclusions about the effect of the proposed development.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

The National Planning Policy Framework

- 3.4 Paragraph 56 of the NPPF says that 'the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people'.
- 3.5 Paragraph 60 says:
 - Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.
- 3.6 Paragraph 61 continues:
 - Although visual appearance and the architecture of individual buildings are very important factors, securing

- high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
- 3.7 Paragraph 63 says that ‘In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area’.
- 3.8 The NPPF says at Paragraph 128 that:
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.
- 3.9 A detailed description and analysis of the heritage significance of 24 Heath Drive and its context is provided earlier in this report.
- 3.10 The NPPF also requires local planning authorities to ‘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’.
- 3.11 At Paragraph 131, the NPPF says that:
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.
- 3.12 Paragraph 132 advises local planning authorities that ‘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’.

- 3.13 The NPPF says at Paragraph 133 ‘Good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development. Good design is indivisible from good planning.’ Paragraph 133 says:

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.

- 3.14 Paragraph 134 says 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.

- 3.15 Further advice within Section 12 of the NPPF urges local planning authorities to take into account the effect of an application on the significance of a non-designated heritage asset when determining the application. It says that ‘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’.

- 3.16 Paragraph 137 of the NPPF advises local planning authorities to ‘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’.

3.17 Paragraph 138 says that:

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.

Planning Practice Guidance

3.18 In 2014 the government published new streamlined planning practice guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled 'Conserving and Enhancing the Historic Environment'. It is subdivided into sections giving specific advice in the following areas:

- Historic Environment Policy and Legislation
- Heritage in Local Plans
- Decision-taking: Historic Environment
- Designated Heritage Assets
- Non-Designated Assets
- Heritage Consent Processes and
- Consultation Requirements

Historic England's Good Practice Advice in Planning Notes

3.19 The NPPF incorporates many of the essential concepts in Planning Policy Statement 5 'Planning for the Historic Environment'. PPS5 was accompanied by a 'Planning for the Historic Environment Practice Guide', published by English Heritage 'to help practitioners implement the policy, including the legislative requirements that underpin it'. In the light of the introduction of the NPPF, Good Practice Advice notes 1, 2 and 3 supersede the PPS 5 Practice Guide, which was been withdrawn on 27 March 2015. These notes are:

- Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans
- Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets

The London Plan

- 3.20 The London Plan 2016 (consolidated with alterations since 2011) is the current the spatial development strategy for London. This document, published in March 2016, is consolidated with all the alterations to the London Plan since 2011. It contains various policies relating to architecture, urban design and the historic built environment.
- 3.21 Policy 7.4 deals with ‘Local character’, and says that a development should allow ‘buildings and structures that make a positive contribution to the character of a place, to influence the future character of the area’ and be ‘informed by the surrounding historic environment’.
- 3.22 Policy 7.8 deals with ‘Heritage assets and archaeology’, and says:
- 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.

- 3.23 Policy 7.9 deals with ‘Heritage-led regeneration’, and says:
- A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm;
 - B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

Camden Local Plan

- 3.24 The Camden Local Plan sets out the Council’s planning policies. It was adopted in June 2017. It replaces Camden’s Core Strategy and Development Policies planning documents adopted in 2010.
- 3.25 Section 7 of the Local Plan deals with Design and Heritage. Policy D2 Heritage, deals with Camden’s heritage assets. The policy asserts that:
- ‘The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.’
- 3.26 In relation to designated heritage assets generally the policy says:
- ‘The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.’
- 3.27 In relation to conservation areas the policy says that:
- ‘In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.'

3.28 In relation to Listed Buildings the policy says that: 'In order to preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.'

4 The proposed scheme and its effect

- 4.1 This section of the report describes the proposed scheme and its effect on the heritage significance described earlier. The proposed scheme is illustrated in the drawings and Design & Access Statement prepared by Kyson Architects.

Background

- 4.2 The scheme has been amended following pre-application discussions (ref. 2017/0914/PRE) with the Council. The Council issued two pre-application responses, dated 15 May 2017 (ref. 2017/0914/PRE) and 25 August 2017 (ref. 2017/4244/PRE).
- 4.3 To support pre-application discussions, KMHeritage drafted an Initial Heritage Appraisal (February 2017)²⁰ to set out an initial and outline assessment of the heritage significance of the site at 24 Heath Drive, and to comment on emerging proposals. KMHeritage issued an Initial Heritage Appraisal Addendum in July 2017²¹.

The purpose of the scheme

- 4.4 The purpose of the proposed scheme is to provide modern family accommodation in keeping with the building's style and heritage significance. The house has been purchased by a couple with a young family, who intend to make 24 Heath Drive their home for the long term. When purchased, the house had been in the same ownership for many decades, and it is clear from an inspection and analysis of the house that:
- It is a long time since the house received any significant work to maintain its fabric and that it is in considerable need of intervention to deal with specific problems. There is substantial water ingress in Bedroom 2, shrubbery has penetrated the building fabric in Bedroom 2, the garage and first floor extension above is falling away from the house and its fixtures and decoration are mouldy and rotting, and many of the window frames are rotting;
 - The 'household' fittings and facilities - bathrooms, kitchen equipment, etc. are now very dated and in need of replacement, and there is no evidence that

²⁰ 24 Heath Drive, London NW3 7SB: Initial heritage appraisal, KMHeritage, February 2017

²¹ 24 Heath Drive, London NW3 7SB: Initial heritage appraisal - addendum, KMHeritage, July 2017

services such as electrical wiring and plumbing have been updated in many decades;

- The house has limited bathroom and family spaces, consistent with the normal pattern of 21st century family life - for example a kitchen area with sufficient space to dine in and en suite bathrooms.

The proposed scheme

- 4.5 It is proposed to alter the house at 24 Heath Drive to provide modern family accommodation in keeping with the building's style and heritage significance. The main changes visible from the Heath Drive (north west) elevation will be (a) two dormer windows and (b) a single height garage, set back from the main façade (not flush as existing), which will replace the current double height garage/bathroom extension. A double height extension in brick on the north-east elevation will be located between the new garage and the replacement single-storey utility room at the rear, both of which will have traditional windows matching those found in this location at present. It will be lower in height than the eaves of the main roof. The ground floor of this extension is intended to expand and augment the existing constrained kitchen and ancillary facilities in this part of the house. The rear (south east) elevation will see a ground floor conservatory-style extension in a minimal render and glass style and some reconfiguration of the rear dormer. The existing basement will be extended to provide a pool and other facilities on this level.
- 4.6 At first floor, the existing dressing room will be subdivided to provide an ensuite bathroom for Bedrooms 2 and 3, with a new door between Bedroom 2 and the ensuite created. The bathroom over the garage will be removed, and the opening to it made good. Bedroom 1 is retained as such, and linked by a new opening to its ensuite in the existing adjacent bedroom.
- 4.7 The Master Bedroom will be located above the kitchen, and linked through a new opening to the side extension, containing a bathroom and dressing room. The existing main first floor bathroom will also be connected to the side extension, as will as the existing WC space adjacent. The stairs to second floor is retained in its present position. Two small new dormers are introduced in the front roof slope, and above the stairs. The accommodation at this level is adjusted to provide two further bedrooms (one with ensuite, a similar position to the existing bathroom), a living room and storage.

The effect of the proposed scheme on heritage significance

- 4.8 The proposals, as revised following pre-application discussions) have comprehensively addressed the Council's pre-application comments. Key revisions include the retention of the secondary staircase to 2nd floor from 1st floor in its existing location, the retention of cupboards adjacent, and the subdivision of only one small room to provide ensembles for the two bedrooms. The northern side elevation will now be approached in a manner such that existing building fabric and openings between the existing yard elevation and the extension are incorporated within the design, and the design of the extension allows the listed building to be clearly legible. The position and set-back of the side extension from the principal frontage means that the visual effect on the listed building and the conservation area will be minimized and significantly enhanced over the existing situation.
- 4.9 A revised approach to the replacement of the bay window to the large rear Living Room allows greater visibility and legibility of the overall rear elevation of the house, and it is expressed in a clearly contemporary style. The terrace at 1st floor level has been omitted. As discussed earlier, the Living Room appears to be much later in its style and detailing than the rest of the house - possibly created in the post-war period - and thus it is proposed to alter the decorative scheme in the room to more closely align with the house and so as to incorporate downlighters.
- 4.10 At basement level, the revised approach works with and echoes the plan of the building above. The existing dormer to the north-east roofscape will be retained in its current location with new rooflights being re-arranged to suit revised proposals, the Council having indicated that dormer windows within the roofscape is considered to be acceptable in principle.
- 4.11 The visible interventions in the building that are proposed are in keeping with the architectural language of the house; for example, the dormers are exactly as one would expect to find on a house of this style and period and the side extension matches the design of the house. The alterations to the rear elevation will have a positive effect on the utility of the house bringing more light into the living room. The new configuration of the north-east elevation will facilitate glimpses of the garden beyond which will enhance the setting of the house by reinstating this visual link from the street frontage. There will be no meaningful visual effect from the proposed basement on the character and appearance of the conservation area.

- 4.12 The proposed changes will only modestly affect the overall footprint of the existing house. The final version of the proposal, following revisions, preserves the plan layout in the majority of the listed building, and preserves it entirely in the most significant parts such as the front reception rooms. Where the plan form has been altered or the layout is proposed to be used in a different way, clear evidence of the previous or original state of the building is left - such as the openings in the north eastern wall or the retention of doors locked in situ. Where functional openings are made, such as between the kitchen and the large rear Living Room, the intervention made is a) in a location that is least sensitive in terms of what is significant in the house and where there is evidence of previous intervention and b) the minimum necessary to facilitate the working of the house as a family home, used in the way that modern families live. These particular openings will be in the form of jib doors so as to preserve the appearance of the wall of the Living Room at the kitchen end.
- 4.13 Throughout, significant original or early detail and fabric will be retained and repaired. This is shown on the scheme drawings. Where joinery items are removed, such as in the kitchen and pantry, they have been assessed as of relatively recent date and of low significance. Intervention in the roof structure of the property to facilitate the location of the boiler and to accommodate other changes required by the proposed scheme is sensitive and appropriate, and designed so as to minimise the loss of original fabric and to secure the stability of the listed building.
- 4.14 The principal elevation and its principal volume will be returned to the same as that of the original house - the removal of the garage/bathroom addition is a highly positive step. The proposed scheme is demonstrably respectful of the character and appearance of the conservation area. It preserves the fabric and appearance of No. 24 Heath Drive in terms of its style, massing and materiality, and thus the contribution it makes to the conservation area.
- 4.15 In our view, the significance, or special interest, of the building is fully preserved and indeed enhanced by these revised proposals. The essential elements of that special interest are retained and celebrated in the scheme, which will rejuvenate the building and extend its life in its original use as a house. Intervention in the building as proposed in the revised scheme is commensurate with the location, nature and extent of special interest found at 24 Heath Drive.

Conclusion

- 4.16 The scheme builds on the essential architectural character of the building. It respects the primacy of the original design and is consistent with, and subservient to, the massing, scale, composition and materials of the buildings. The interventions proposed are in keeping with and respect the heritage significance of the house, the conservation area and the setting of nearby listed buildings. The scheme will assist in updating this 110-year-old house for 21st century living whilst respecting its original character and appearance.
- 4.17 The proposed scheme will, at the very least, preserve the significance of 24 Heath Drive and the character and appearance of the Redington/Frogna Conservation Area. It does this not only by virtue of the quality of its design, but also by helping to underpin and reinforce the residential nature of this part of the conservation area in retaining the house for use as one family unit, thereby maintaining the contribution that 24 Heath Drive makes to the conservation area over the long term. In our view, the scheme goes beyond this - it will preserve and enhance No. 24 Heath Drive with the addition of high-quality residential accommodation that will help sustain this listed building in its optimum viable use over the long-term. The removal of the garage/bathroom extension is a positive measure that enhances both the house and the conservation area.
- 4.18 All that is significant about 24 Heath Drive in heritage and townscape terms will be preserved and enhanced by the proposals. The effect of the development will be confined to 24 Heath Drive itself and to properties in the immediate vicinity of 24 Heath Drive rather than the entire street. There will be no effect from the proposed scheme on the conservation area further afield, and there is no visual interconnectivity with the listed buildings described earlier in the report.

5 Compliance with legislation, policy and guidance

- 5.1 This report has provided a detailed description and analysis of the significance of No. 24 Heath Drive and its heritage context, as required by Paragraph 128 of the National Planning Policy Framework. In addition, the report also describes (in Section 4 ‘the proposed development and its effect’) how the proposed scheme will affect that heritage significance. The effect is positive, and for that reason, the scheme complies with policy and guidance. This section should be read with Section 4.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed scheme affecting the No. 24 Heath Drive preserves and enhances the special architectural or historic interest of 24 Heath Drive as a listed building and the Redington/Frognaal Conservation Area, and has preserves the setting of nearby listed buildings (i.e. the *designated* heritage assets that are the subject of the Act). The proposed development thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It does not lead to ‘substantial’ harm or any meaningful level of ‘less than substantial’ harm to any heritage assets.
- 5.3 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573, and is met if the proposed development leaves the conservation area unharmed. The proposed scheme is demonstrably respectful of the character and appearance of the conservation area. We believe it would enhance the conservation area.
- 5.4 In considering the proposed scheme for 24 Heath Drive it is worth noting Historic England’s online guidance regarding ‘Legal Requirements for Listed Building and Other Consents’²². Historic England points out that ‘Most of the principles that should be adhered to when making planning and other consent decisions affecting the historic environment are set out in policy and guidance. However, the law introduces some important and inescapable considerations for certain applications’.
- 5.5 Historic England continues:

²² <http://historicengland.org.uk/advice/hpg/decisionmaking/legalrequirements/>

When considering any conservation area consent or planning permission decision that affects a conservation area a local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of that area....

The House of Lords in the South Lakeland case²³ decided that the "statutorily desirable object of preserving the character or appearance of an area is achieved either by a positive contribution to preservation or by development which leaves character or appearance unharmed, that is to say preserved."

A development that merely maintains the status quo, perhaps by replacing a building that detracts from the character and appearance of the conservation area with a similarly detrimental building, would satisfy the statutory consideration. This is notwithstanding that the existing detrimental building presents an opportunity, when it is being redeveloped, to improve the environment.

However, in a number of ways the policies in the NPPF seek positive improvement in conservation areas. Most explicitly paragraphs 126 and 131 require that local planning authorities should take into account "the desirability of new development making a positive contribution to local character and distinctiveness". Paragraph 9 says that pursuing "sustainable development involves seeking positive improvements in the quality of the...historic environment...". The design policies further reinforce the objective of enhancement of an area's character and local distinctiveness, concluding that "Permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area..." (paragraph 64).

Compliance with both the statutory consideration and the NPPF policies therefore, generally speaking, requires account to be taken of the desirability of taking opportunities to enhance the character and appearance of a conservation area. As such, whilst the South Lakeland case is still relevant to the interpretation of statute, its effect on decision-making has apparently been negated in this respect by the policies in the NPPF.

- 5.6 The key word in the final paragraph of this extract is 'apparently'. This carefully chosen word makes it abundantly clear that it is far from certain that the South Lakeland decision has been definitively altered by the National Planning Policy Framework. One reason is that it, as a legal decision, cannot be altered without a similar

²³ *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573

decision or legislation that overturns it – policy, even national planning policy guidance, cannot overturn legal decisions such as South Lakeland. Planning decisions are ultimately made in a legal and policy context – not just in a policy context alone.

- 5.7 The conclusion is this: it would be extremely difficult to portray the proposed scheme for 24 Heath Drive as doing anything less than maintaining the ‘status quo’ in the Redington/Frogna Conservation Area, given the level of heritage significance found at the property and in adjacent properties, and the evident quality of architectural design that is present in the proposal.

The National Planning Policy Framework

The level of ‘harm’ caused by the proposed scheme

- 5.8 As outlined in Section 4, the NPPF identifies two levels of potential ‘harm’ that might be caused to a heritage asset by a development: ‘substantial harm...or total loss of significance’ or ‘less than substantial’. Both levels of harm must be caused to a *designated* heritage asset – in this instance 24 Heath Drive itself, the setting of other listed buildings or the Redington/Frogna Conservation Area.
- 5.9 The proposed scheme does not lead to ‘substantial’ harm or any meaningful level of ‘less than substantial’ harm to designated heritage assets. As has been explained earlier, the proposal very evidently does not result in the ‘total loss of significance’ of any listed building or the conservation area that equates to substantial harm.
- 5.10 The only potential for ‘less than substantial’ harm would be if the proposed scheme for 24 Heath Drive caused the loss of a significant component of its special interest or that of the Redington/Frogna Conservation Area or nearby listed buildings. There is nothing about the proposal that would give rise to this level of harm.
- 5.11 While the listed building itself will be altered by the proposed scheme, this will preserve and enhance the special interest of the listed building or the conservation area, for the reasons given earlier. The external appearance of the house facing Heath Drive will be enhanced by the removal of the later garage/bathroom addition. Alterations elsewhere in the listed building are in areas of less sensitivity in heritage terms, and the scheme intervenes in a manner commensurate with the distribution of special architectural and historic interest in the house, as closely analysed earlier in this report. The most sensitive areas are those least altered by the proposed scheme, and intervention occurs in less sensitive areas.

5.12 The proposed scheme therefore complies with Paragraph 133 of the NPPF - it certainly does not lead to 'substantial harm to or total loss of significance of a designated heritage asset'. It also complies with Paragraph 134 for the reasons given in detail earlier – the scheme cannot be considered to harm the conservation area or listed buildings that it affects. Any 'less than substantial harm to the significance of a designated heritage asset' (Paragraph 134) - if any - that might be ascribed to the scheme is outweighed by the heritage benefit of a scheme that demonstrably enhances the conservation area and the setting of listed buildings over the present situation.

The balance of 'harm' versus benefit

5.13 In any event, the scheme provides a tangible public and heritage benefit by helping to sustain this listed building in its original, optimum, viable use as a house and the contribution it makes to the conservation area, reinforcing the essential character and appearance of this part of the conservation area and helping to update the property for modern use - thus securing its long-term future. This more than outweighs what low level of 'harm' - if any - that might be asserted regarding the scheme. The core special architectural and historic interest of the conservation area and nearby listed buildings is preserved as a result of the proposed scheme.

Compliance with the NPPF

5.14 In respect of Paragraph 131 of the NPPF, the proposed scheme can certainly be described as 'sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'. It helps to sustain, by virtue of the quality of the scheme design, the special architectural or historic interest of the listed building and the 'positive contribution' that 24 Heath Drive makes to the Redington/Froggnal Conservation Area.

5.15 As set out above, the proposed scheme complies with Paragraph 133 of the NPPF - it certainly does not lead to 'substantial harm to or total loss of significance of a designated heritage asset'. It also complies with Paragraph 134 for the reasons given in detail earlier in this report – the scheme cannot be considered to harm 24 Heath Drive, other listed buildings or the conservation area, but rather alters 24 Heath Drive in a fashion that has a relatively small effect on overall heritage significance. Any 'less than substantial harm to the significance of a designated heritage asset' (Paragraph 134) - if any - that can be ascribed to the scheme is outweighed by the explicit benefits described above. This balance of intervention versus significance is described earlier.

The London Plan

- 5.16 The proposed scheme for 24 Heath Drive is exactly what the London Plan envisages when it talks (in Policy 7.4) about developments having ‘regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings’. As described here and in the Design & Access Statement, the design of the proposed scheme is inherently responsive to the nature and special interest of 24 Heath Drive and adjacent listed buildings, as well as the urban grain and townscape character in its vicinity (notably in the removal of the garage/bathroom insertion). The proposed scheme is of ‘the highest architectural quality’ and includes ‘details and materials that complement... the local architectural character’. The scheme thus complies with Policy 7.4.
- 5.17 For the reasons given above and in the Design & Access Statement, the proposed scheme will ‘make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context’ as required by Policy 7.6, and will satisfy that policy in terms of quality and ‘proportion, composition, scale and orientation’ so that it ‘activates and appropriately defines the public realm’, as well as the other criteria contained in the policy.
- 5.18 The proposed scheme adds life and vitality to the setting of heritage assets - the ‘desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping’ has been taken into account, as the Design & Access Statement shows. The scheme clearly ‘conserve[s] the significance of heritage assets], by being sympathetic to their form, scale, materials and architectural detail’. For these reasons, the scheme is consistent with Policy 7.8 of the London Plan.
- 5.19 It is also consistent with Policy 7.9 of the Plan – the ‘significance’ of the heritage assets in its context has been ‘assessed’ and the scheme is ‘designed so that the heritage significance is recognised both in [its] own right and as [a] catalyst for regeneration’.

Camden Local Plan

- 5.20 In positively addressing the requirements of the National Planning Policy Framework, the works also meet the policy requirements of Camden’s local plan relevant to heritage assets.
- 5.21 The proposed scheme complies with Policy D2 Heritage. It will very clearly not ‘cause harm to the special architectural and historic interest of the building’, cause

‘loss of or substantial harm to a designated heritage asset’ or ‘cause harm to significance of a listed building through an effect on its setting.’

- 5.22 Similarly, it can certainly be said of the proposed scheme that it does not cause harm to the character or appearance of the conservation area.’

6 Summary and conclusion

- 6.1 This report describes the site and its surroundings in Section 2, and sets out a summary of the area's history along with an account of the development of 24 Heath Drive. The house was built 1907, and it is located in the Redington/Froggnal Conservation Area. It was designed by CHB Quennell and is a Grade II listed building. Nos. 25 and 26 Heath Drive were also designed by Quennell, and are also listed.
- 6.2 Section 2 describes how the house has evolved and Section 3 analyses the heritage significance of the site and its context. It sets out a detailed description of where significance lies and the nature of the special architectural or historic interest of the listed building.
- 6.3 Section 4 describes the proposed scheme and its effect on that heritage significance. The proposed scheme for No. 24 Heath Drive is a sensitive and considered scheme to adapt the existing house for ongoing family use. In our view, the individual external alterations proposed - the rebuilt garage, the side and rear extensions, the dormers and in the basement area - will, individually and cumulatively preserve and enhance the listed building and its contribution to the setting of other listed buildings locally and the character and appearance of the conservation area. None of the interventions proposed approach the level of change that would diminish or harm the special interest or significance of the listed building at 24 Heath Drive, the harm the setting of its listed neighbours, or harm the character and appearance of the conservation area. In our view, the overall level of intervention remains well below that threshold, and the scheme is measured and sensitive.
- 6.4 Indeed, by refurbishing the fabric of the building and selectively extending it, the scheme will enhance the house. It will preserve and enhance the listed building itself, the character and appearance of the Redington/Froggnal Conservation Area and the setting of nearby listed buildings with an improved house that will help sustain the building in its optimum viable use over the long term. The interventions required to achieve this are modest and in keeping with the house and the conservation area. The removal of the garage/bathroom extension is a positive measure that enhances both the house and the conservation area.
- 6.5 All that is significant about No. 24 Heath Drive in heritage and townscape terms will be preserved and enhanced by the proposals. The contribution that 24 Heath Drive makes to the conservation area - through its presentation

and appearance to the street - will be considerably improved by the proposals.

- 6.6 For these reasons, discussed at greater length in the report, the proposed scheme will comply with the law, and national and local policies and guidance for urban design and the historic built environment.

KMHeritage

72 Pymer's Mead
London SE21 8NJ
T: 020 8670 9057
F: 0871 750 3557

mail@kmheritage.com
www.kmheritage.com

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