



28 Avenue Road, London, NW8 6BU

Heritage Statement:
Heritage Significance, Impact Assessment and Justification Statement

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Heritage Information Ltd

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28 Avenue Road – Heritage Statement

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1.0. INTRODUCTION

- 1.1. The site of 28 Avenue Road, London, NW8 6BU comprises a large garden space; the house at No. 28 was demolished during the late 1960s, but the late 19th-century lodge house adjoining the entrance driveway fronting Avenue Road remains. The site is located within the Elsworthy Road Conservation Area, London Borough of Camden.
- 1.2. This Heritage Statement has been produced to inform an application for planning permission for the erection of a new dwelling on the plot at No. 28 Avenue Road.
- 1.3. This Heritage Statement complies with the requirements of the National Planning Policy Framework, February 2019 (NPPF) and the online Planning Practice Guidance (PPG) in respect of Heritage issues. No archaeological matters are covered in this report.
- 1.4. This Heritage Statement has been written in accordance with Historic England Advice Note 12: "Statements of Heritage Significance" (October 2019), and has adopted the following structure:
 - Section 1: Introduction including summary of findings.
 - Section 2: An appraisal of the heritage context of the subject site.
 - Section 3: An historical background of the site.
 - Section 4: A description of the subject site as existing.
 - Section 5: An appraisal of the significance of the site.
 - Section 6: An assessment of the potential or actual impact of the proposed works upon the character and appearance of the Elsworthy Road and on the settings of any other heritage assets.
 - Section 7: How the proposed works comply with relevant policies in the NPPF and the PPG, and how the works are in accordance with local and regional planning policies.

1.5. Summary

- The subject site at 28 Avenue Road comprises a garden plot and lodge house within the Elsworthy Road Conservation Area.
- An assessment of the significance of the site concludes that it possesses low archaeological interest, low architectural and artistic interest, and low historic interest. The setting of 28 Avenue Road enclosed within the garden area is considered to be of low to medium value. The site as existing is considered to make a neutral contribution to the character and appearance of the Conservation Area, whilst the existing former lodge house fronting Avenue Road makes a positive contribution.
- An assessment of the impact of the proposals concludes there will be a **minimal and positive impact on the character and appearance of the Conservation Area and a negligible impact on the setting of the Grade II Registered Primrose Hill**. The proposals have taken full account of the advice provided by the Council in the two pre-application responses by reducing the size and scale of the building and the prominence of the chimneys. The proposed replacement building successfully echoes the Neo-Georgian classical style of architecture which characterises the Avenue Road Sub-Area; the high-quality design, detailing and use of materials are considered to add renewed architectural interest to a

distinctively high-quality area which has historically undergone redevelopment and to which the existing site contributes in only a neutral way. The proposals offer enhancements to the appreciation and understanding of the heritage significance of the Elsworthy Road Conservation Area:

- The implementation of an architecturally literate design for the proposed house appropriate to its context, which makes a positive, enhancing contribution to the appearance, character, quality and local distinctiveness of the Conservation Area through the reinstatement of an appropriately designed building on the historic plot and the use of high-quality design, detailing and materials.

1.6. Authorship

- **Dorian A T A Crone** BA BArch DipTP RIBA MRTPI IHBC - Heritage and Design Consultant. Dorian has been a Chartered Architect and Chartered Town Planner for over 30 years. He has also been a member of the Institute of Historic Building Conservation for 25 years. Dorian is a committee member of The Society for the Protection of Ancient Buildings, the International Committee on Monuments and Sites (ICOMOS), ICOMOS UK and Institute of Historic Building Conservation. He has been a court member with the Worshipful Company of Chartered Architects and a trustee of the Hampstead Garden Suburb. He is Chairman of the City Heritage Society and is a member of the City Conservation Area Advisory Committee. Dorian is also a trustee of the Drake and Dance Trusts, and a Scholar of the Society for the Protection of Ancient Buildings.

Dorian has worked for over 30 years as Historic Buildings and Areas Inspector with English Heritage, responsible for providing advice to all the London Boroughs and both the City Councils. Dorian has also worked as a consultant and expert witness for over 20 years advising a wide variety of clients on heritage and design matters involving development work, alterations, extensions and new build projects associated with listed buildings and conservation areas in design and heritage sensitive locations. He is a panel member of the John Betjeman Design Award and the City of London Heritage Award, and is a Design Review Panel member of the South West Region, the London Boroughs of Richmond upon Thames, Lewisham, Islington and Wandsworth, and the Design Council. Dorian has also been involved with the Royal Academy Summer Exhibition Architectural Awards and the Philip Webb Award along with a number other public sector and commercial design awards.

Dr Daniel Cummins MA (Oxon) MSc PhD IHBC – Historic Environment Consultant. Daniel is an historian with a BA and Master's in History from Oxford University and a doctorate from the University of Reading, where he specialised in ecclesiastical buildings and estates. Daniel has a Master's degree in the Conservation of the Historic Environment and is a member of the Institute of Historic Building Conservation. He provides independent professional heritage advice and guidance to leading architectural practices and planning consultancies, as well as for private clients. He has an excellent working knowledge of the legislative and policy framework relating to the historic environment. Daniel has extensive experience in projects involving interventions to listed buildings and buildings in conservation areas, providing detailed assessments of significance and impact assessments required for Listed Building Consent and Planning Permission.

1.7. Methodology

This assessment has been carried out gathering desk-based and fieldwork data. The documentary research was based upon primary and secondary sources of local history and architecture, including maps, drawings and reports. Particular attention was given to the Camden Local Studies and Archives Centre, as well as the City of Westminster Archives Centre which holds the records for the Eyre Estate. A site visit was conducted on 18th July 2017 when a review of the subject site was conducted by visual inspection to analyse the site and identify the relevant parts of the Elsworthy Road Conservation Area that would be most affected by the proposed works. Consideration has been given to its historical development, building types, materials of the key buildings and distinctive urban grain which contribute to the identification of the built form and the understanding of the special character of the area. The settings of nearby heritage assets were also identified in relation to the site in order to assess the potential impact of the proposals on their settings.

2.0. LOCATION AND CONTEXT

- 2.1. 28 Avenue Road is located on the north side of Avenue Road diagonally opposite the junction with Acacia Road (Figure 1). Avenue Road is a wide, leafy street with a suburban character, albeit with the road being a relatively busy thoroughfare. The mature trees lining the road, along with hedges and other trees in front gardens or visible behind the houses in rear gardens, help to soften the streetscape (Figures 2 and 4).

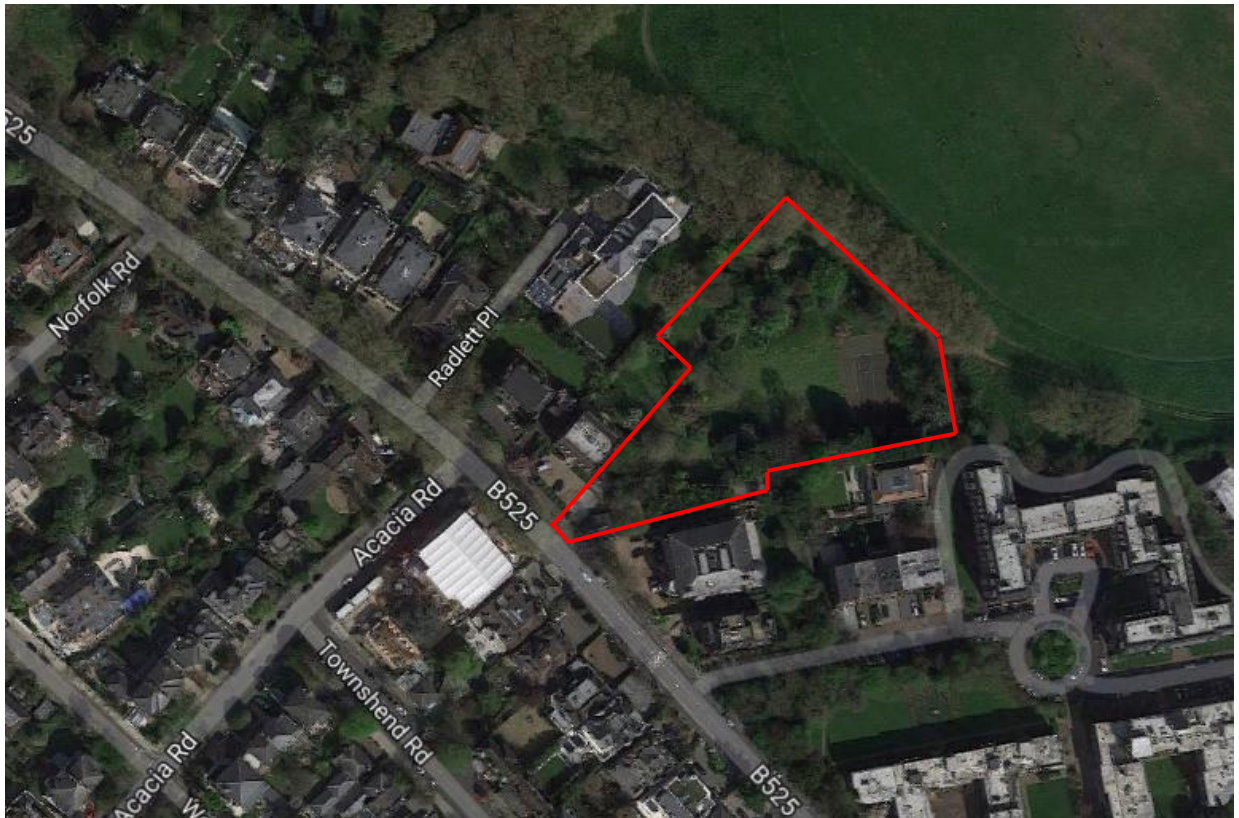


Figure 1: The location of the subject site (outlined in red).



Figure 2: The suburban townscape of Avenue Road, looking west from the street frontage of the subject site.

- 2.2. The subject site is located within the Elsworthy Road Conservation Area, designated by the London Borough of Camden in 1973 and was extended in 1985 to include the buildings on the north side of Avenue Road. No. 28 Avenue Road is located in Sub-Area 1: Avenue Road. The character of the sub-area remains that of a wealthy residential suburb characterised by the spacious leafy street and large plots, and an open urban grain. Detached and semi-detached villas and houses of two to three storeys (often with a mansard roof and dormers) predominate; the houses are set back from the road with strong well defined front boundaries often with high walls or gates. The houses have differing styles but similar form, height and size (Figures 3 and 4).
- 2.3. In Avenue Road grand detached houses are prevalent in dark red or brown brick, or in painted stucco finishes echoing carved stone buildings. Most of the villas on Avenue Road within the Conservation Area are replacements, the originals having been demolished and rebuilt, with noticeable rebuilding taking place from the 1930s onwards in the Neo-Georgian style of architecture (Figure 4). The neighbouring building to No. 28 (No. 30) is an example of an early replacement building (rebuilt in 1937 in an interpretation of the Neo-Georgian style). Three original houses survive: Nos. 42, 44 and 48, although even these have been altered and extended (Figure 3). They are stucco two-storey villas of classical detailing with stucco front walls and gate piers. No. 34 aims to reflect the historic scale, bulk and detail of earlier villas and is constructed in yellow stock brickwork again in the Neo-Georgian style (Figure 4). No 46 is a 1960s neo-Classical example of three storeys, with a symmetrical stuccoed and pedimented front (Figure 3). Another 20th century example is the neo-Georgian red brick house at No 50.
- 2.4. Plots have also been amalgamated, thereby reducing the density of buildings from the original 19th-century layout; the subject site is an example of this, having amalgamated Nos. 28 and 30 after the late 1960s demolition of No. 28. Nos. 22 and 24-26 Avenue Road, 'The Pavilions', are modern in character and the buildings are of a design and scale that are somewhat at odds with the surrounding character of the Conservation Area (Figure 5).



Figure 3: Nos. 46 and 48 Avenue Road, the former built in the 1960s, both regarded as positive buildings within the Elsworthy Road Conservation Area.



Figure 4: The rebuilt No. 34 Avenue Road adjacent to the 1930s replacement house at No. 30 (right).



Figure 5: The 'Pavilions' at 22-26 Avenue Road adjacent to the subject site are atypical to the character of Avenue Road by nature of their design and scale.

- 2.5. The rear of the site (north-east boundary) backs onto Primrose Hill, a Grade II Registered Park on the Register of Parks and Gardens which is particularly notable for its panoramic views towards the City of London. The entry on the Register notes that the 19th-century housing developments to the north and west sides are largely screened by trees planted to the boundaries of the park and within rear gardens. This was verified during the site visit; the image at Figure 6 shows that the subject site and Conservation Area cannot be seen from Primrose Hill, particularly when descending from the viewpoint walking west and then following the path towards the entrance on Elsworth Terrace (Figure 6).



Figure 6: Looking south-west towards the subject site from the Grade II Registered Park, Primrose Hill, illustrating that the buildings fronting Avenue Road cannot be seen, the site shown by an arrow.

3.0. HISTORICAL BACKGROUND

- 3.1. No. 28 Avenue Road was built on the St John's Wood Estate belonging to the Eyre family. During the late 18th century, the ground on which the building was later developed formed part of a large meadow known as the Blewhouse Field; the Marylebone and Finchley Turnpike Branch Road (later Avenue Road) was laid through it in 1824 and stimulated the development of large detached houses in the area. The presence of Primrose Hill and Regent's Park was particularly important in encouraging spacious middle-class housing. No. 28 occupied a large site enveloping the south and east sides of the garden of No. 30; it adjoined Primrose Hill to the east and the boundary of the Eyre Estate with the Portland Estate to the south (Figure 7). A building lease of the plot was granted to William Robert Fry in 1842 which stipulated only hothouses, greenhouses and a single-storey ornamental cottage for a gardener could be erected on the site, together with one or two detached houses at a distance of 250 feet from the turnpike road. A strip of land along the south boundary was kept separate as a possible road linking the turnpike with Primrose Hill, but this was never carried out and later became part of the gardens of No. 28. The lease plan at Figure 7 depicts the initial footprint of the house with a pond to the south-eastern corner of the garden. The drainage plan from the same year depicts the extent of the plot and the footprint of the building in greater detail, showing the principal house in red, with single-storey glazed verandahs and the service range in pink, and a separate service building to the north in purple which probably included a stables and coach house (Figure 7a).

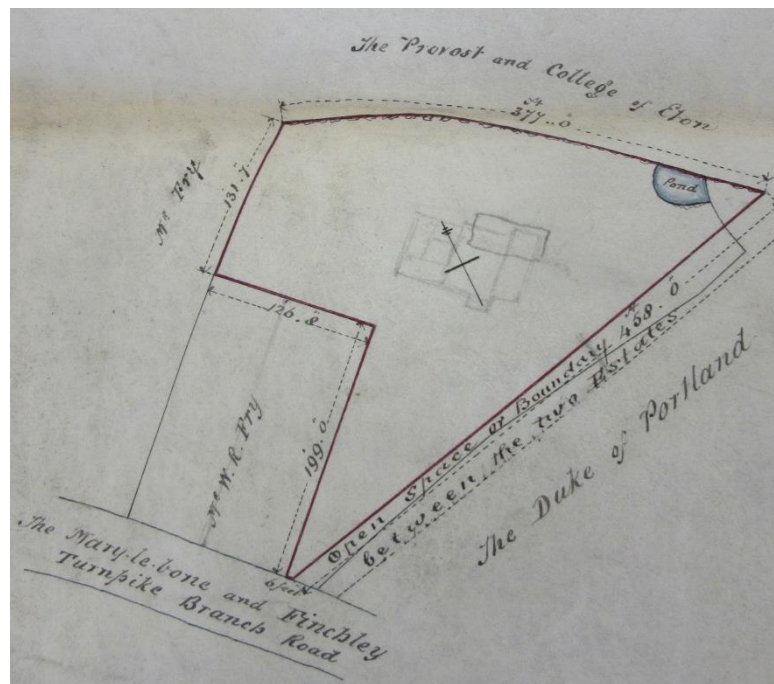


Figure 7: Lease plan showing the footprint and layout of No. 28, enveloping the site of No. 30 (1842).

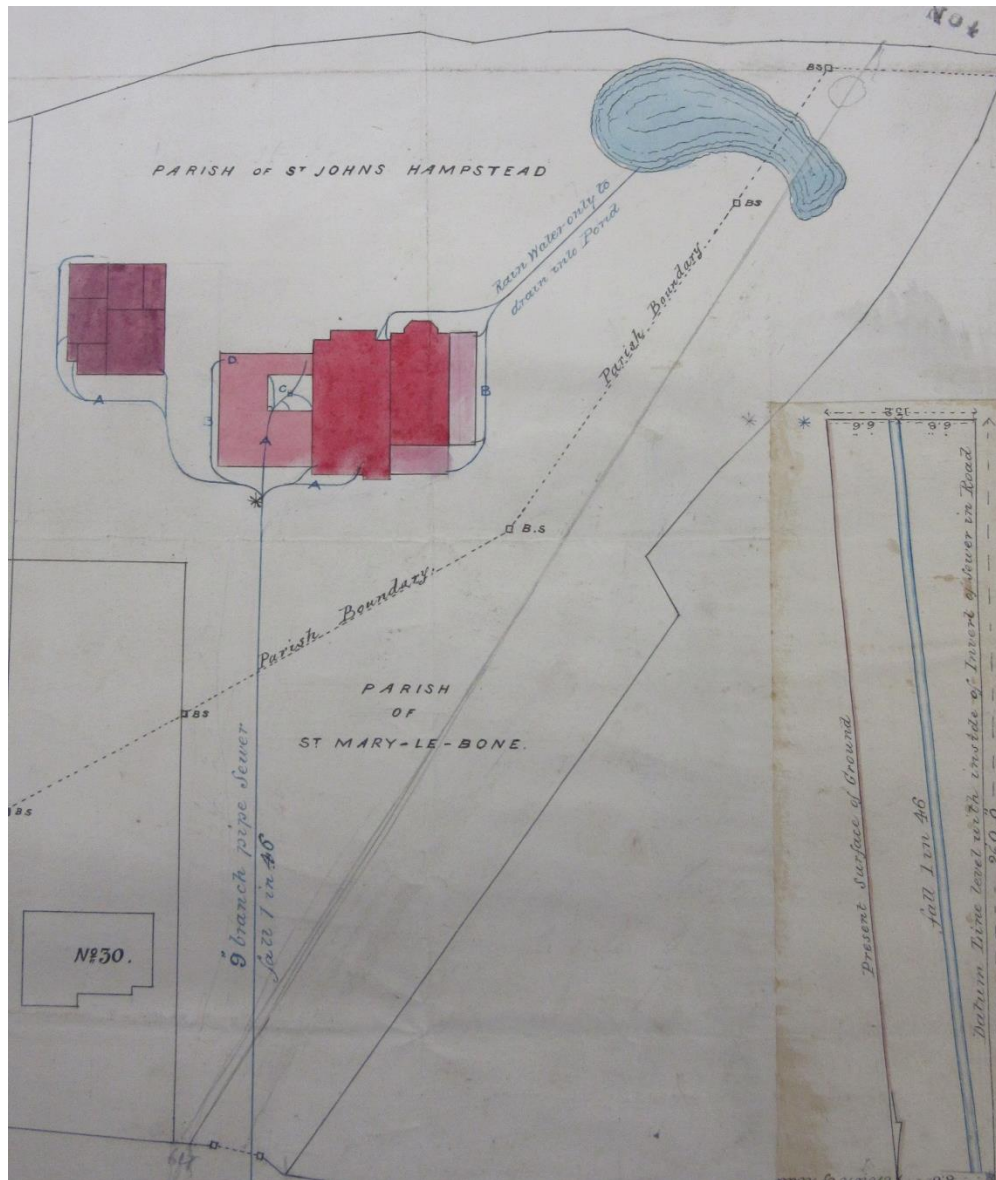


Figure 7a: Drainage Plan of 1842 showing the footprint and layout of the buildings at No. 28.

- 3.2. The architectural style of No. 28 is difficult to ascertain owing to the lack of drawings and images. Drawings made for later drainage plans depict the rear elevation and floor plans, however, which suggest that the building reflected the Italianate villa influences of many of the original buildings on Avenue Road. The three ranges which made up the house are clearly discernible on the drainage plan at Figure 7a. To the south side of the house was a three-storey gabled range with a shallow-pitched roof and with round-headed windows to the attic storey above a two-storey canted bay; the fenestration was grouped into three lights. Adjoining the range to the ground floor was a covered arched verandah. To the centre of the house was a two-storey gabled range; this range had wide-projecting eaves and a two-storey square bay topped with balustrading. The bay had a balcony supported by brackets with railings to the first floor. North of this central range was a lower two-storey service range which was gabled on an east-west axis with a flat-roof link to the main house; there was a very large chimney stack to the ridge above the ground-floor kitchen (Figure 8). The plan of the ground floor of the house (Figure 9) depicts other features, including a bowed verandah adjacent to the front entrance on the north-west elevation and a circular turret to the south-west corner.



Figure 8: The rear elevation of No. 28 (as depicted in 1948, when the first-floor link was created between the house and service range.

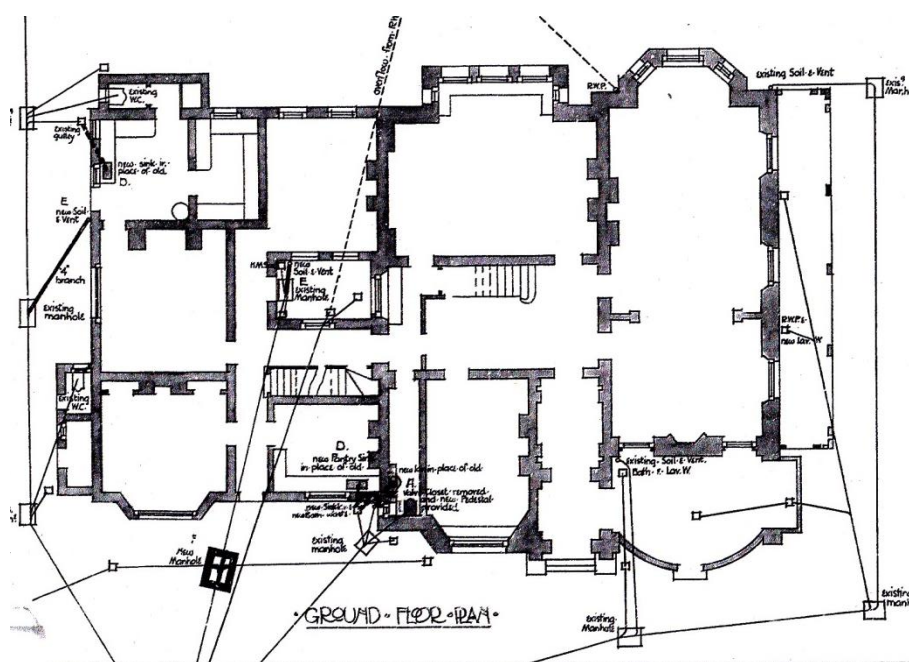


Figure 9: Plan of the ground floor of No. 28 Avenue Road (1905).

- 3.3. Fry conveyed the lease of No. 28 to Richard Holland Esq later in 1842; Holland is recorded in 1861 as a 'fundholder' meaning he derived his income from shares and investments. By 1853, the map of the Eyre Estate at Figure 10 depicts No. 28 as built. No. 28 comprised the large house and a separate service building on its north side which included a cottage. James Cockburn had the lease of No. 28 from 1863 following Holland's death, at which time it included a dwelling house, and gardener's cottage, coach house and stable (together probably forming the northern service building).



Figure 10: Plan of the Eyre Estate (1853), the subject site outlined in red.

- 3.4. The first edition of the Ordnance Survey made in 1866 (Figure 11) shows the site in much greater detail. At No. 28, the house was approached along a curved driveway; there was a projecting bay and conservatory to the front (south-west) elevation, a glazed verandah to the south-east elevation overlooking the lawns, and two projecting bays to the rear north-east elevation. The detached service building to the north remained and comprised several parts probably including a glasshouse, the stable and coach house. The pond remained to the south-east corner of the garden with a bridge across. The grounds were landscaped with ornamental pathways leading through shrubberies; the house would have been screened from the road and from Primrose Hill by this planting.

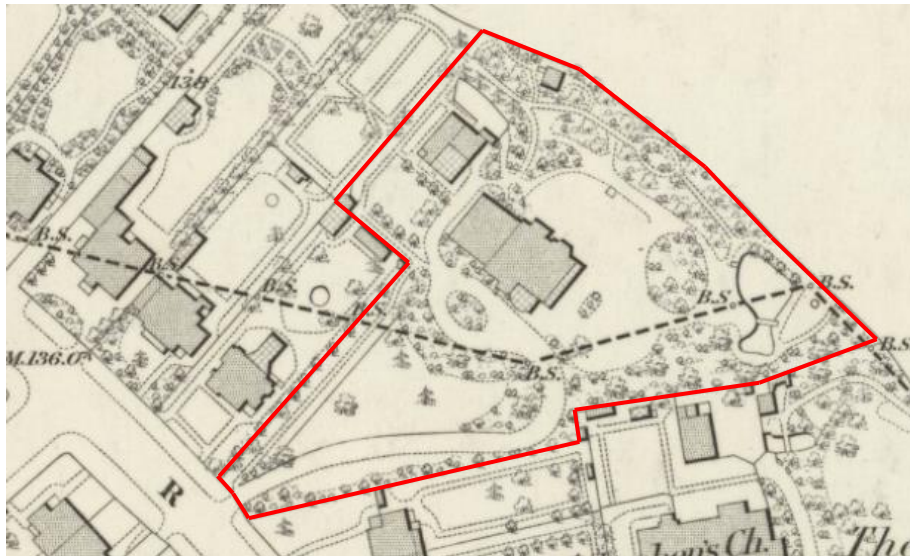


Figure 11: Ordnance Survey (1866-71), the subject site outlined in red.

- 3.5. Hannah Behrens, a wealthy spinster from Manchester, took the lease of No. 28 in 1880 and applied to the Eyre Estate to make alterations. These included adding bay windows to the south-west side of the house, adding a cleaning room and servant's WC on the north-west side, enlargements to the service rooms on the north-east side, and building a lodge house at the entrance from Avenue Road. By 1883, the former service building to the north side of the site appears to have been largely rebuilt, with a new stables and coach house with yard to the north corner of the site, together with two large glasshouses (Figures 12 and 12a). The pond had been filled in by this time, whilst the driveway forked adjacent to the new lodge, the south curved route being original and the north straight route leading directly to the new service yard. Figures 12 and 12a also show the additions to the north-west side of the house. No. 28 was known as "Ellel Lodge" by this time.

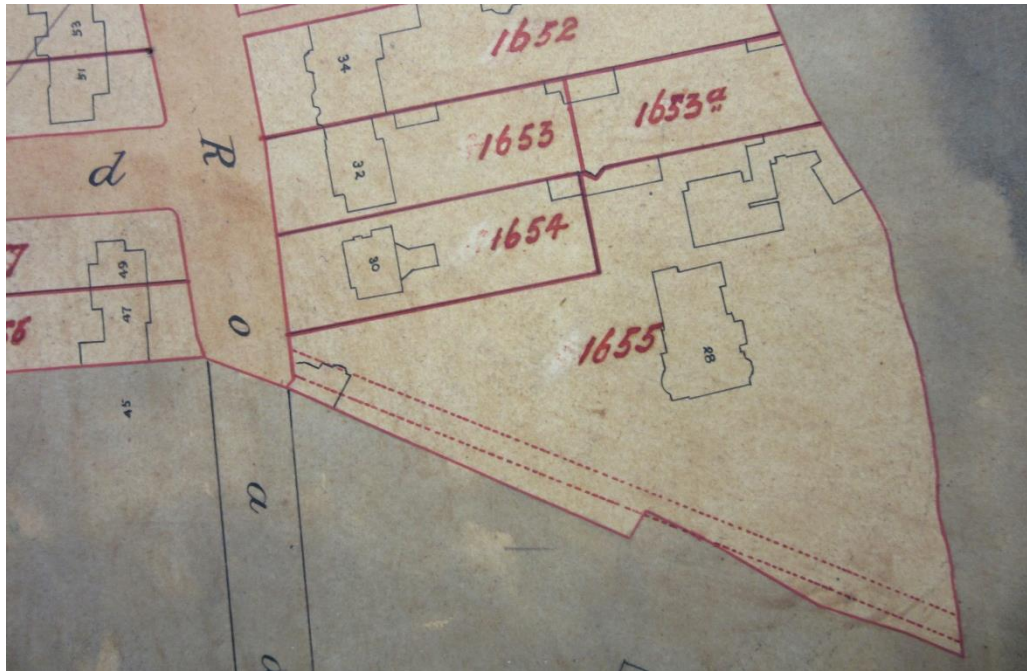


Figure 12: Plan of the Eyre Estate (1883), the subject site marked 1654 and 1655.



Figure 12a: Ordnance Survey (1895), the subject site outlined in red.

- 3.6. In 1901, Hannah Behrens employed numerous staff at No. 28 including two housemaids, a ladies maid, kitchen maid, housekeeper, butler and footman; the gardener and his wife lived in the lodge house. Hannah Behrens died in 1904 and the estate was sold, at which time it was described as comprising 'an excellent town residence' standing in about an acre and a quarter of grounds with stabling for five horses, coach house for six carriages, harness and forage rooms, coachman's cottage, glasshouses and modern lodge house. The house comprised thirteen bedrooms, an entrance and inner hall, lofty dining room, double drawing room, morning room, conservatory, and 'very complete ground-floor domestic offices'; the gardens were described as well-timbered with extensive lawns and banks of rhododendrons and ranges of vineries (London Evening Standard, 04 June 1904). The ground floor plan dating from this time can be seen in Figure 9. A band of planting had appeared creating a buffer between the north-west
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boundary and Primrose Hill (Figure 13). No. 28 was purchased by Edward Rosenberg, an American manufacturer of paints and varnishes; he lived there in 1911 with his wife, niece, and eight domestic servants.



Figure 13: Ordnance Survey (1912-15), the subject site outlined in red.

- 3.7. No. 28 remained unchanged by the 1930s, when it was occupied by Edward Robson and his wife; he had been resident since 1917 (Figure 14). Very little damage occurred on the site during the Second World War – the lodge house to No. 28 suffered some minor blast damage, whilst some of the glasshouses to the north-western boundary also suffered some general non-structural blast damage.

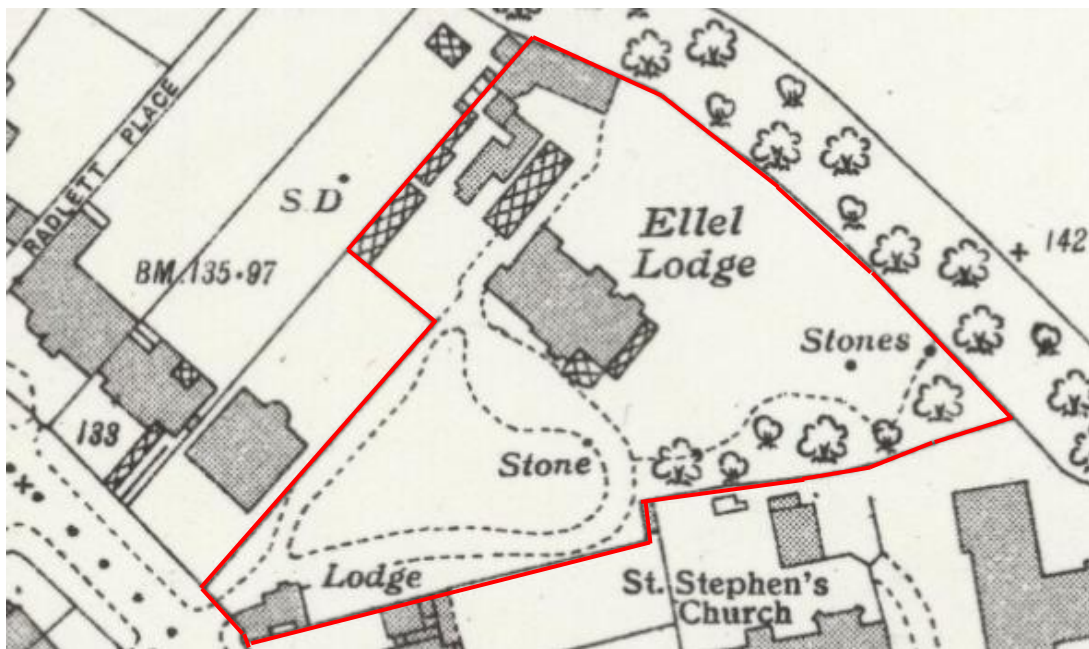


Figure 14: Ordnance Survey (1935-37), the subject site outlined in red.

- 3.8. By the 1950s, No. 28 with its grounds and outbuildings remained largely unchanged (Figure 15). By 1961 however, a map of the Eyre Estate reveals that the freehold of No. 28 had been sold by this time. Furthermore, by 1961, all the outbuildings and glasshouses on the north side of the site at No. 28 had been demolished and the cleared site had been absorbed into the plot of No. 30. A small open-fronted summerhouse had been erected within the newly extended garden adjoining the new boundary with No. 28 (Figure 16).



Figure 15: Ordnance Survey (1952-54), the subject site outlined in red.



Figure 16: Plan of the Eyre Estate (1960), the subject site outlined in red.

- 3.14. During the late 1960s, Ellel Lodge was demolished. No replacement building has been constructed on the site of No. 28, which has been landscaped as gardens. Some tennis courts were constructed to the south-east corner by the early 1980s. Planning permission for a major extension adjoining the south-east elevation of No. 30 extending into the plot of No. 28, and permission for a garage with a flat above within the gardens of No. 28, were granted in 1992 and 1994 respectively but were never implemented.

4.0. DESCRIPTION OF THE SUBJECT SITE

- 4.1. There is one building located on the subject site: the single-storey lodge house built in 1880 for No. 28. This is built of yellow London stock brickwork with double sash windows and a slate roof. It is plain and understated but the decorative bargeboards to the gabled roof with projecting eaves and brackets above the entrance porch and bay window (which also has a roundel) suggest a rustic cottage orné style. The chimneys have been lost. The elevation fronting the road is gabled with an arch-topped window opening (infilled to the top) containing two small sash windows with a column between the two lights (Figure 17). The adjoining gates mark the former driveway to No. 28 which survives in its original location adjacent to the south boundary with landscaping and planting to its northern side; the boundary wall to its southern side was rebuilt in 2014 (Figure 18).



Figure 17: The lodge house (north elevation) belonging to No. 28 Avenue Road.



Figure 18: The original driveway of No. 28 looking north-east.

- 4.2. The main area of the historic plot is screened from the public realm by landscaping and the 1930s house at No. 30. There is little or no trace of any historic landscaping or built structures. The rear boundary line of No. 30 is marked by steps and a change in ground level, beyond which is ground belonging to No. 28 (Figure 19). Adjacent to the steps is a platform which probably formed the base for the open-fronted garden structure visible on the 1960s map in Figure 16. The remainder of this raised area was the late 19th century stables yard and glasshouses belonging to No. 28; this area contains a modern greenhouse and shed and has been landscaped with no evidence of former structures or floor surfaces (Figure 20).



Figure 19: The plot boundary to No. 30 with the platform of the garden building depicted in 1960 within the plot of No. 28.



Figure 20: The area to the north of the garden that once housed the late 19th century stables, coach house and glasshouses belonging to No. 28; there are no extant remains of these buildings.

- 4.3. The site of the demolished house at No. 28 is an open lawn surrounded by densely planted borders and trees. There are no traces of the continuation of the driveway or of the house. A fragment of brickwork topped with a pump survives and possibly comes from the former house, although it is doubtful they are in situ. Modern tennis courts with wire fencing are located to the south-east corner of the garden (Figures 21 and 22). The boundary wall to the rear of the garden fronting Primrose Hill is largely overgrown but appears to be original.



Figure 21: The location of the demolished No. 28 looking south, showing modern landscaping and tennis courts (left).



Figure 22: The location of the demolished No. 28 looking north from the top of the driveway, showing modern landscaping and fragment of brickwork with pump.

5.0. ASSESSMENT OF SIGNIFICANCE

- 5.1. Significance is defined by Historic England as “The sum of the cultural and natural heritage values of a place, often set out in a statement of significance”.
- 5.2. The aim of a Significance Assessment is, in the terms required by Paragraphs 189-190 of the NPPF, a “*description of the significance of a heritage asset*”. In the context of a historic building which has been the subject of a series of alterations throughout its lifetime, it is also a useful tool for determining which of its constituent parts holds a particular value and to what extent. *Good Practice Advice in Planning Note 2* (March 2015) states that understanding the nature of significance is important for understanding the need for and best means of conservation. Understanding the extent of that significance leads to a better understanding of how adaptable a heritage asset may be. Understanding the level of significance provides the essential guide as to how policies should be applied.
- 5.3. The descriptive appraisal will evaluate the site against listed selection criteria of ‘Principles of Selection for Listing Buildings’, DCMS, 2018. Historic England’s ‘Advice Note 12: Statements of Heritage Significance’ (October 2019), which partially overlap with the Statutory Criteria, have also been considered. Historic England identifies three potential points of interest that can be held by heritage assets; artistic and architectural, historical and archaeological:
- **Archaeological Interest:** There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - **Architectural and Artistic Interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
 - **Historic Interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.
- 5.4. Although not officially considered to be one of the four principal values, **setting** is increasingly viewed as an important value that makes an important contribution to the significance of a heritage asset. This assessment of the contribution to significance made by setting should provide the baseline along with the established values used for assessing the effects of any proposed works on significance.

The level of significance for each value and the setting will be assessed using the following grading:

- **High** – values of *exceptional or considerable* interest;
- **Medium** – values of *some* interest;
- **Low** – values of *limited* interest.

5.5. Archaeological Interest

The subject site was built on previously undeveloped fields and is not located within an Archaeological Priority Area, but it is immediately adjacent to the Primrose Hill Archaeological Priority Area. With the exception of the lodge house, the house, outbuildings and landscaped gardens at No. 28 have been lost entirely; whilst there may be surviving fragments below ground, such evidence would not be of sufficient significance to reveal additional information relating to the development of the settlement and uses of the site. In terms of archaeology, there is therefore considered to be limited potential for primary evidence about past human activity and so **archaeological interest is low**.

5.6. Architectural and Artistic Interest

The site has limited architectural interest given it has comprised a landscaped garden space since the 1960s. The lodge house is the only built form on the site and appears to be largely unaltered in its exterior form, with the exception of the loss of its chimneys. The lodge house is of a simple rustic classical design that reflects its historic uses as a practical subsidiary building alongside the retained driveway and gates to the demolished house at No. 28. It also somewhat of a landmark building within the streetscape of Avenue Road owing to its distinctive architectural style and projecting front building line.

The artistic value of the site is derived from the modern landscaping which provides an attractive natural and green setting for the site alongside Primrose Hill; the landscaping is not considered to possess any heritage value in its own right. **Architectural and artistic value is therefore low**.

5.7. Historic Interest

The subject site embodies the development of the Eyre Estate during the middle of the 19th century as part of a fashionable suburb around the new turnpike road and in close proximity to Regent's Park and Primrose Hill. An appreciation and understanding of the site comprising a distinct plot laid out in the early development of the Eyre Estate has been largely lost since the 1960s when the original house was demolished. The lodge house however is a physical reminder of the grand Italianate townhouse (demolished during the late 1960s) set within spacious gardens that characterised No. 28, although the existing plot has been entirely re-landscaped and was never associated with any individuals or events of note. Whilst the subject site helps to reinforce the sense of the place and character, it has always been in private ownership and (with the exception of the lodge house) largely concealed from the public realm behind planting and the neighbouring house at No. 30. There is therefore considered to be very limited potential for collective memory and experience. **Historic interest is therefore low**.

5.8. Setting

The subject site is located within the Elsworthy Road Conservation Area, but only the former lodge house is considered to make a positive contribution to its character and appearance; the site of the demolished original building is concealed in views from the public realm. The setting to the rear is formed by the Grade II Registered Primrose Hill; the site however is enclosed by dense planting on both sides of the boundary and no existing structures within the site can be seen from Primrose Hill. The garden

setting incorporates glimpsed views of roofscapes and rear elevations of neighbouring buildings on Avenue Road, but the landscaping and the planting to the boundaries enhances the sense of tranquillity and enclosure. **The value of the setting is therefore considered to be low to medium.**

5.9. Summary of Significance

As the site of a demolished mid-19th century grand house, No. 28 is considered to possess minimal heritage significance in itself beyond the former lodge house and driveway. The site makes little if any contribution to the public realm, whilst any proposed development on the site presents the opportunity for the reinstatement of an appropriately designed building within the historic plot.

6.0. IMPACT ASSESSMENT

- 6.1. A scheme detailing proposals at the subject site has been prepared by SHH Architects and Interior Designers. The proposals involve the erection of a new dwelling on the plot at No. 28 Avenue Road.
- 6.2. The proposals may have an impact on:
 - The character and appearance of the Elsworth Road Conservation Area;
 - The setting of the adjacent Grade II Registered Primrose Hill.
- 6.3. For the purposes of assessing the likely impact to result from the proposals and the subsequent impact on the settings of the identified heritage assets, established criteria have been employed. If the proposed development will enhance heritage values or the ability to appreciate them, then the impact on heritage significance within the view will be deemed **positive**; however, if they fail to sustain heritage values or impair their appreciation then the impact will be deemed **negative**. If the proposals preserve the heritage values then the impact will be deemed **neutral**.
- 6.4. Within the three categories there are four different levels that can be given to identify the intensity of impact:
 - **"negligible"** – impacts considered to cause no material change.
 - **"minimal"** - impacts considered to make a small difference to one's ability to understand and appreciate the heritage value of an asset. A minor impact may also be defined as involving receptors of low sensitivity exposed to intrusion, obstruction or change of low to medium magnitudes for short periods of time.
 - **"moderate"** - impacts considered to make an appreciable difference to the ability to understand or appreciate the heritage value of an asset.
 - **"substantial"** - impacts considered to cause a fundamental change in the appreciation of the resource.
- 6.5. Two pre-applications have been undertaken which involve the reinstatement of a dwelling on the historic site of No. 28. The first response was received in 2018, when the Conservation and Design Officer raised some concern at the proposed size and massing of the building and recommended a building of a more modest size (2017/6191/PRE). The second response was received in 2019, when officers found

the reduced mass and scale more acceptable, although some concern was raised regarding the size and prominence of the chimneys (2019/4316/PRE).

- 6.6. The proposed new building on the reinstated No. 28 plot will be built on the same location as the original 19th century house demolished during the 1960s. The existing gardens contain no landscaping or features of interest which would be harmed by the redevelopment of the site; any identified significant individual or groups of trees will be retained within the landscaping scheme. The design, materials and detailing of the proposal reflect the architectural language of the Avenue Road Sub-Area, particularly the stuccoed villas and the large number of Neo-Georgian redevelopments which began to characterise the local context from the 1930s onwards, many of which have been identified as positive contributors to the character and appearance of the Conservation Area. The proposed Neo-Georgian style was considered acceptable by officers within both pre-application responses as “in keeping with the general character of the conservation area”.
- 6.7. A Neo-Georgian classical style is proposed for the new building, comprising a symmetrical principal front elevation of two projecting three-bay wings flanking a central three-bay entrance portico. The elevational treatment will be stuccoed with rustication to the ground floor, and incorporating a traditional classical horizontal subdivision of the façade with string coursing details and a moulded cornice beneath the parapet. The roof form will comprise a traditional mansard roof covered with grey slate; the size and prominence of the chimneys has been reduced to take into account the advice provided in the second pre-application. The windows will comprise traditional timber sash windows recessed within their openings and with moulded surrounds; the classical hierarchy of the elevations will be evident by the reduced proportionality of the first floor window openings. The height of the building will be limited to two storeys and a mansard storey to reflect the local context; the height of the ridge line will be marginally lower than the adjacent Neo-Georgian mansion at 1 Radlett Place. The proposed new building has therefore adopted an architecturally literate traditional Neo-Georgian idiom to sit comfortably within the built context of this part of the Conservation Area. Indeed, the proposed palette of materials, proportions and scale were considered acceptable by the Council in the second pre-application response.
- 6.8. The reinstatement of an appropriately designed building within the historic plot is considered to be a substantial enhancement in better illustrating the historical development of the area. The existing lodge house, which has been assessed as possessing some significance and contributing positively to the character and appearance of the Conservation Area, will be retained, whilst the existing gateway and driveway (original location) to No. 28 will also be retained. The proposed building would not be visible from the street on Avenue Road owing to the existing building at No. 30 and the proposed dense planting screens around the reinstated boundaries with No. 28. The street frontage to Avenue Road with its architecturally distinctive lodge house will therefore be sustained by the proposals.
- 6.9. It is not considered that the setting of the Grade II Registered Primrose Hill will be affected detrimentally by the proposed development. As well as the appropriate height and scale of the proposal, the site is largely screened from views within the park owing to the density of trees on both sides of the eastern boundary. The proposals include additional tree planting of appropriate species to prevent any views of the proposal from Primrose Hill. Any potential glimpses would be limited to the winter months when there are no leaves on the trees, but at most would include filtered glimpses of the building which would sit comfortably in its surrounding built context.

- 6.10. This impact assessment has also evaluated the proposals according to the ten characteristics of the Government's **National Design Guide** (October 2019) (ref. Appendix 1), in particular Characteristic 1: understanding the history of the area, the settings of heritage assets and the context of the site (appropriate form, appearance, scale, details and materials) in order that the proposal relates well to its surroundings; and Characteristic 2: reinforcing a coherent and distinctive identity (appropriate scale, height, materials, façade design and consideration of views) that relates well to the history and context of the site. The proposed architectural language, materials, detailing and scale have been a direct response to the prevailing local character (as described in Section 2 above), ensuring that the proposed building will sit comfortably within this part of the Elsworthy Road Conservation Area, thereby sustaining and reinforcing a more positive and coherent identity within the area.
- 6.11. This impact assessment has also evaluated the proposals according to the eight principles of the **Building in Context Toolkit** (2001) which was formulated by English Heritage and the Design Council (then CABE) to stimulate a high standard of design for development taking place in historically sensitive contexts; the principles are listed in Appendix 2. The proposals have taken full account of the principles, particularly in understanding the history of the place and lie of the land (Principle 2), designing the building so it sits happily in the pattern of existing development (Principle 4), respecting the important views and vistas from Primrose Hill (Principle 5), respecting the scale of neighbouring buildings within the Sub-Area (Principle 6), and using high quality materials as found on existing buildings (Principle 7).
- 6.12. Based on the above detailed assessments in Sections 2 to 5 and in accordance with the Historic England guidance **Setting of Heritage Assets** (December 2017), the Impact Assessment has also appraised the effects of the proposed development on the setting of the Registered Primrose Hill and on the ability to appreciate its significance (Step 3). Every effort has been made to avoid or minimise harm (Step 4) by the appropriate height and scale of the proposed building, together with the provision of enhanced planting and landscaping to the boundary of the rear garden.
- 6.13. Overall, it is considered that the proposals would have **a minimal and positive impact** on the character and appearance of the Elsworthy Road Conservation Area and a **negligible impact** on the setting of the Grade II Registered Primrose Hill. The proposed replacement building successfully echoes the Neo-Georgian classical style of architecture which characterises the Avenue Road Sub-Area; the high-quality design and use of materials, as well as the reinstatement of an appropriately designed building within the historic plot, are considered to add renewed architectural interest to a distinctively high-quality area and to which the existing site contributes in only a neutral way. The high-quality design has fully addressed the historic local context and the settings of all identified nearby heritage assets in accordance with the Historic England guidance on setting (December 2017). **The proposals are considered to cause no harm to the significance and settings of any heritage assets.**

7.0. POLICY COMPLIANCE AND JUSTIFICATION STATEMENT

7.1. Camden Local Plan (2017)

7.1.1. The Local Plan was adopted in July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

7.1.2. Policy D1 deals with design.

The Council will seek to secure high quality design in development. The Council will require that development:

- *a. respects local context and character;*
- *b. preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";*
- *e. comprises details and materials that are of high quality and complement the local character;*
- *f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- *j. responds to natural features and preserves gardens and other open space;*
- *k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- *m. preserves strategic and local views;*

The proposed new building at No. 28 Avenue Road has been designed to the highest standards in order to integrate fully into the surrounding built environment by adopting a high-quality design which reflects the local context, drawing on the architectural language, materials, detailing and forms of the surrounding Neo-Georgian buildings. The proposal does not seek to replicate the local architectural character; rather it presents an architecturally literate and enhancing opportunity to reinforce the general local character of this part of the Conservation Area. The Neo-Georgian and classical form, use stucco render, classical proportions and hierarchy, horizontal subdivisions of the elevations, openwork balustrading to the parapet, traditional mansard roof covered with grey slate, and well-proportioned timber sash windows recessed within the window openings, are all distinguishing features of the surrounding multi-phased high quality architecture on Avenue Road. The proposed height, bulk and mass reflects that of the neighbouring buildings, ensuring the proposed house is not an overly dominant addition within the wider setting of Primrose Hill. Every effort has been retain existing significant trees within the site and to enhance the planting around the boundaries in order to enhance the green quality of the area and to minimise any visual impact of the proposed building. Although currently a garden, the historic plot of No. 28 comprised a large detached villa until the 1960s. The frontage of the site to Avenue Road, comprising the lodge house and original driveway, will be sustained by the proposals, whilst the proposed house will not be visible from the public realm within the street. **The proposals therefore comply with Policy D1.**

7.1.3. Policy D2 deals with heritage.

The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, 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;*

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- *b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- *c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

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.

To identify the heritage values and character of the subject site, an analysis was undertaken to include its origins, how and why it has changed over time, the form and state of its constituent elements and materials, and how the place is connected through to past people, events and aspects of life. Based on the characterization, significance and impact assessments undertaken as part of this report, the reinstatement of a contextual Neo-Georgian building of high-quality design within the historic plot of No. 28 will have a minimal and positive impact. It is understood to be a Local Authority objective to preserve or enhance the character and/or appearance of the Conservation Area as an area of special architectural and historic interest. The site currently possesses low heritage values and makes a neutral contribution to the character and appearance of the Conservation Area. It is considered that the proposed new development achieves a high standard of design that would provide enhancement to the baseline conditions on the site, as well as preserving positive elements such as the lodge house. The quality of the design, materials, and detailing have been considered essential criteria in the design proposal. **The proposals are considered to cause no harm to character and appearance of the Elsworthy Road Conservation Area and so comply with Policy D2 in relation to designated heritage assets.**

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;*
- *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.*

The proposal will offer the opportunity for enhancement of the character and appearance of the area by the addition of a well-designed architecturally literate Neo-Georgian building within the historic plot of No. 28, better reflecting the historic layout and development of the area. The design, materials and detailing of the proposal reflect the architectural language of the Avenue Road Sub-Area of the Elsworthy Road Conservation Area, particularly the stuccoed villas and the large number of Neo-Georgian redevelopments which began to characterise the local context from the 1930s onwards, many of which have been identified as positive contributors to the character and appearance of the Conservation Area. The proposed building would have no visual impact from the public realm on Avenue Road – the proposed enhanced landscaping and planting would enhance the green character of the area. In addition, the former lodge house, which makes a positive contribution to the character and appearance of the Conservation Area, will be retained and so there will be a negligible impact from the public realm on Avenue Road. **The proposals therefore comply with Policy D2 in relation to Conservation Areas.**

7.2. Elsworthy Road Conservation Area Management Strategy (2009)

New development within the Conservation Area should show special consideration to the elevational treatment, scale, bulk and massing of buildings and where possible respect the traditional forms and rooflines of the Conservation Area (12.3).

The proposed new building at No. 28 Avenue Road has been integrated fully into the surrounding built environment by adopting a high-quality design which reflects the local context, drawing on the Neo-Georgian architectural language, materials, detailing and forms of many of the surrounding buildings. The stuccoed classical elevational treatment of the proposed house at No. 28 reflects well the language and detailing of a number of identified positive contributors at Nos. 42-48 Avenue Road. The proposed height and scale of the building and its traditional mansard roof form reflect the general character of the Conservation Area.

New development should reflect and reinforce the original rhythm and density of development of the streetscape...Where original plots have been amalgamated to create larger units the Council will look favourably on proposals to reinstate the historical layout of the plots which restore the original rhythm and character (12.4).

The proposals are considered to reinforce the original rhythm and density of streetscape of Avenue Road by the provision of an appropriately designed building within the historic plot of No. 28; this will enhance the low density character which is a distinctive feature of the Avenue Road Sub-Area. The prominence of the late 19th century lodge house within the streetscape will be sustained.

Development proposals must preserve or enhance the character or appearance of the Elsworthy Conservation Area (13.14).

It is considered that the proposals both preserve and enhance the character and appearance of the Conservation Area. The former will be achieved by the retention of the lodge house fronting Avenue Road and that the new building will not be visible from the public realm on Avenue Road. The latter will be achieved by the implementation of an architecturally literate Neo-Georgian design appropriate to its context, which makes a positive and enhancing contribution to the appearance, character, quality and local distinctiveness of the Conservation Area through the use of high-quality design, detailing and materials.

7.3. London Plan (2016)

7.3.1. The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. Chapter 7 sets out policies on a range of issues about the places and spaces in which Londoners live, work and visit. The policies are designed to create a city of diverse, strong, secure and accessible neighbourhoods, and a city that delights the senses which has the best of modern architecture while also making the most of London's built heritage (London Plan, para. 7.1.).

7.3.2. **Policy 7.4** deals with local character:

B Buildings, streets and open spaces should provide a high quality design response that:

- **d** allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- **e** is informed by the surrounding historic environment.

The design of the proposed building has been informed by the surrounding built environment on Avenue Road. The architectural language, proportions, palette of materials, detailing, height and scale have been a direct response to the prevailing local character, ensuring that the proposed building complements the character and appearance of the Avenue Road Sub-Area of the Conservation Area. Furthermore, the proposals are considered to reinforce the original rhythm and density of the streetscape of Avenue Road by the reinstatement of an appropriately designed new building within the historic plot of No. 28, thereby also better reflecting the historical layout and development of the area. The future character of the area will be shaped in a way that is informed by its historical development and built character. **The proposals therefore comply with Policy 7.4 of the London Plan.**

7.3.3. **Policy 7.6** deals with architecture:

B Buildings and structures should:

- **a** be of the highest architectural quality
- **b** be of a proportion, scale and orientation that enhances, activates and appropriately defines the public realm
- **c** comprise details and materials that complement, not necessarily replicate, the local architectural character
- **d** not cause unacceptable harm to the amenity of surrounding land and buildings.

The proposed house has been designed in order to integrate fully into the surrounding built environment by adopting a high-quality design which reflects the local context, drawing on the architectural language, materials, detailing and forms of the surrounding buildings. The Neo-Georgian design does not seek to replicate the local architectural character; rather it presents an appropriate and enhancing opportunity to reinforce the local character and sense of place, thereby also sustaining and enhancing the character and appearance of the Elsworth Road Conservation Area. It is considered that by better reflecting the local character in terms of the design, detailing, materials, height, bulk and mass seen on the high-quality buildings within the Avenue Road Sub-Area, the proposal will establish a literate architectural dialogue with the other high-quality buildings on Avenue Road. **The proposal therefore complies with Policy 7.6.**

7.3.4. **Policy 7.8** deals with 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.
- **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.

It is considered that the proposals will sustain and enhance the character and appearance of the Elsworth Road Conservation Area. The key elements which contribute to the character and appearance of the Conservation Area, such as the lodge house and views of landscaping and trees within rear gardens will be sustained and enhanced by the proposals. The proposed new building has been carefully designed to sustain and enhance the character and appearance of the Conservation Area by the reinstatement of the historic plot at 28 and the provision of a high-quality contextual Neo-Georgian building, which also sustains the suburban grain and low density development of the Avenue Road Sub-Area. **The proposals therefore comply with Policy 7.8.**

7.4. The National Planning Policy Framework (February 2019)

- 7.4.1. The revised National Planning Policy Framework (NPPF) was introduced in February 2019 and provides a full statement of the Government's planning policies.
- 7.4.2. The NPPF contains a presumption in favour of sustainable development sympathetic to the conservation of designated heritage. The government's definition of sustainable development is one that incorporates all the relevant policies of the Framework, including the protection and enhancement of the historic environment.
- 7.4.3. Relevant NPPF Policies are found in Section 12 "Achieving Well-Designed Places" and Section 16 "Conserving and Enhancing the Historic Environment".
- 7.4.4. Paragraph 124 states that *"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"*. Section 12 goes on to outline the core expectations for good design and the importance of engagement between stakeholders relating to design:

Paragraph 127. Planning policies and decisions should ensure that developments:

- *a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

Paragraph 131. In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

The tenets of these paragraphs support the importance of good design in relation to conserving and enhancing the historic environment in Section 16:

Paragraph 192. In determining applications, local planning authorities should take account of:

- *c) the desirability of new development making a positive contribution to local character and distinctiveness.*

This heritage statement has demonstrated how the design of the proposed house addresses the elements of the site and its surroundings by analysing the historic context and characterisation of the area, and providing an appraisal of the history and significance of the subject site. The **National Design Guide** and the **Building in Context Toolkit** were used as part of the process to ensure to highest standard of design, detailing and suitability to the location and setting of the subject site. The proposed house has been designed to the highest standards in order to integrate fully into the surrounding built environment by adopting a high-quality design which reflects the local context, drawing on the architectural language, materials, detailing and forms of the buildings within the Avenue Road Sub-Area. The designs do not seek to replicate the local architectural character; rather they present an architecturally literate and enhancing opportunity to reinforce the local character, thereby also enhancing the character and appearance of the Conservation Area as a whole. The Neo-Georgian and classical

form, use stucco render, classical proportions and hierarchy, horizontal subdivisions of the elevations, openwork balustrading to the parapet, traditional mansard roof covered with grey slate, and well-proportioned timber sash windows recessed within the window openings, are all distinguishing features of the surrounding multi-phased high quality architecture on Avenue Road. The proposals are considered to complement the local context and will therefore preserve and enhance the character and appearance of the Conservation Area, and will not cause harm to the settings of any other surrounding heritage assets by virtue of the subservient and appropriate massing, height and use of materials. **Therefore, the proposals comply with Section 12 of the NPPF 'Achieving Well-Designed Places'.**

- 7.4.5. Section 16 deals with Conserving and Enhancing the Historic Environment. Paragraph 184 states that heritage assets “*an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*”.

Paragraph 194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- *a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- *b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

It is considered that the proposals would not cause “substantial harm” (nor indeed “less than substantial harm”) to the character and appearance of the Elsworthy Road Conservation Area, or to the setting of the nearby Grade II Registered Primrose Hill. Particular consideration in the design of the proposed building has been given to respect and reflect the prevailing Neo-Georgian architectural language, palette of materials, height, scale and massing in order to sustain and enhance the character and appearance of the Conservation Area, and to ensure the work is appropriate within the setting of the adjoining Registered Park. The key elements of townscape which contribute positively to the character and appearance of the Conservation Area (the former lodge house and landscaping) would be sustained and enhanced by nature of the high-quality contextual design of the proposals. Therefore, it is argued that the proposals will not cause substantial harm to the significance of any designated heritage assets.

Paragraph 196. 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, where appropriate, securing its optimum viable use.

It is considered that the proposals would cause no harm to the significance of any heritage assets and therefore no balancing exercise of public benefits would be required. However, the proposals are considered to offer some degree of heritage benefit by nature of enabling a better appreciation and understanding of the character and appearance of this part of the Elsworthy Road Conservation Area. The proposals offer enhancements to the appreciation and understanding of the heritage significance of the Elsworthy Road Conservation Area:

- The implementation of an architecturally literate design for the proposed house appropriate to its context, which makes a positive, enhancing contribution to the appearance, character, quality and local distinctiveness of the Conservation Area through the reinstatement of an appropriately designed building on the historic plot and the use of high-quality design, detailing and materials.

Paragraph 200. 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 the asset (or which better reveal its significance) should be treated favourably.

The impact of the proposals has been assessed in conjunction with the effects on the character, distinctiveness and significance of the surrounding historic environment. The Elsworth Road Conservation Area has been subject to considerable change (represented by the continuing process of development on Avenue Road) and in order to remain a sustainable and pleasing place, it will continue to change. The proposed scheme will represent an appropriate approach respecting the historic significance of the site and its surroundings. The appreciation of the character, appearance and historic values of the Conservation Area has been a key consideration in the design concept of the proposals, driven by an approach aiming at local distinctiveness and sensitivity. Furthermore, the proposals are considered to reinforce the original rhythm of the streetscape of Avenue Road by the reinstatement of an appropriately designed building within the historic plot of No. 28, thereby also better reflecting the historical layout and development of the area. The proposal preserves and enhances those elements of the character and appearance of the area that make a positive contribution – views of gardens and greenery, the prevailing materiality, detailing and scale of the local built form. Opportunities for enhancements which will better reveal the significance of the Conservation Area and the contribution the subject site makes to it include the enhancement of the character and appearance of the Conservation Area by better reflecting the prevailing local architectural context, materials and building pattern.

7.5. National Planning Guidance (PPG)

7.5.1. Revised in July 2019, the PPG is an online guidance resource which is updated continuously.

7.5.2. Paragraph: 002 Reference ID: 18a-002-20190723 - What is meant by the conservation and enhancement of the historic environment?

- *The conservation of heritage assets in a manner appropriate to their significance is a core planning principle...Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets...In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time.*

The proposals recognise that the conservation of heritage assets must be in a manner appropriate to its determined significance and that heritage assets are an irreplaceable resource. Equally important is the definition of 'conservation' as the 'active process of maintenance and managing change'. This is implicit in the appropriate development within a Conservation Area by nature of providing a high-quality new building which will enhance and better reveal its character and appearance.

7.5.3. **Paragraph: 008 Reference ID: 18a-008-20190723 - How can proposals avoid or minimise harm to the significance of a heritage asset?**

- *Understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm. Analysis of relevant information can generate a clear understanding of the affected asset, the heritage interests represented in it, and their relative importance.*

A characterization study, significance and impact assessment has been undertaken as part of this application and its findings incorporated into the design. Visual inspection of the site informed constraints and opportunities and there was a conscious effort to minimise the impact of the proposed new building upon the character and appearance of the Elsworthy Road Conservation Area and the setting of the Grade II Registered Primrose Hill.

8.0. CONCLUSION

- 8.1. The proposals have been designed to cause no harm to the character and appearance of the Elsworthy Road Conservation Area. Indeed the proposed new building at No. 28 has been designed to offer the opportunity for enhancement. The existing site at 28 makes a neutral contribution to the character and appearance of the Conservation Area, comprising only a garden with no evidence of the former mid-19th century grand house which was demolished during the 1960s. The street frontage, which includes the former lodge house, makes a positive contribution to the character and appearance of the Conservation Area and will be sustained by the proposals.
- 8.2. An assessment of the impact of the proposals concludes there would be **a minimal and positive impact** on the character and appearance of the Elsworthy Road Conservation Area and **a negligible impact** on the setting of the Grade II Registered Primrose Hill. The proposed new building presents the opportunity to reinstate an appropriately designed building within the historic plot at No. 28 - a high-quality and architecturally literate Neo-Georgian building which reflects the architectural language, detailing, materials, height and scale of the prevailing built form within the Avenue Road Sub-Area of the Conservation Area.
- 8.3. This Heritage Statement has been written in accordance with the latest Historic England Guidance, particularly relating to the structure and content of assessments of heritage significance (October 2019). The impact assessment evaluated the proposals according to the ten characteristics of the Government's *National Design Guide* (October 2019), in particular Characteristic 1: understanding the history of the area, the settings of heritage assets and the context of the site (appropriate form, appearance, scale, details and materials) in order that the proposal relates well to its surroundings; and Characteristic 2: reinforcing a coherent and distinctive identity (appropriate scale, height, materials, street frontage, façade design and consideration of views) that relates well to the history and context of the site. The proposed scheme has also been assessed against the eight principles of the *Building in Context Toolkit*. The proposed new work has been designed to reflect the local context in height, mass and scale, and will use high-quality traditional architectural language and detailing which will respect and reflect the local context to ensure the proposed new building is a well-considered addition. **The proposals are considered therefore to cause no harm to the significance of any heritage assets.**

- 8.4. The applicant has recognised the importance of performing investigations and analysis necessary for the assessment of the effects of the proposed works on the special interest of the identified heritage assets. This approach has been beneficial with regard to the process of acknowledging the best practice guidance as outlined in the NPPF and in local policies. It is considered that the information provided in this Heritage Statement is proportionate to the significance of the subject site. It sets out an appropriate level of detail sufficient to understand the potential heritage implications of the proposals in accordance with the proportionate approach advocated by Paragraph 189 of the NPPF.
- 8.5. The proposal is considered to sustain the historic and architectural interest of the Conservation Area and other nearby heritage assets by sustaining and enhancing those elements of significance that have been identified as contributing to their special interest and settings. It is therefore concluded that the proposed works satisfy the relevant clauses of the NPPF. These are consistent with the spirit of local, regional and national planning policies and conservation principles.

APPENDIX 1: NATIONAL DESIGN GUIDE CHARACTERISTICS (EXCERPTS)

1. Context is the location of the development and the attributes of its immediate, local and regional surroundings.

C1 Understand and relate well to the site, its local and wider context

Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- the existing built development, including layout, form, scale, appearance, details, and materials;
- local heritage – see below – and local character;
- landform, topography, geography and ground conditions;
- landscape character, drainage and flood risk, biodiversity and ecology;
- access, movement and accessibility;
- environment – including landscape and visual impact, microclimate, flood risk, noise, air and water quality;
- views inwards and outwards;
- the pattern of uses and activities, including community facilities and local services; and
- how it functions.

Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including:

- the landscape character and how places or developments sit within the landscape, to influence the siting of new development and how natural features are retained or incorporated into it;
- patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, form and scale;
- the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development.

C2 Value heritage, local history and culture

When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.

Well-designed places and buildings are influenced positively by:

- the history and heritage of the site, its surroundings and the wider area, including cultural influences;
- the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;
- the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details

2. The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses.

I1 Respond to existing local character and identity

Local identity is made up of typical characteristics such as the pattern of housing, and special features that are distinct from their surroundings. These special features can be distinguished by their uses and activity, their social and cultural importance, and/or their physical form and design. Most places have some positive elements of character, particularly for their users. These can help to inform the character of a new development.

Well-designed new development is influenced by:

- an appreciation and understanding of vernacular, local or regional character, including existing built form, landscape and local architectural precedents;
- the characteristics of the existing built form;
- the elements of a place or local places that make it distinctive; and
- other features of the context that are particular to the area – see Context .

This includes considering:

- the composition of street scenes, individual buildings and their elements;
- the height, scale, massing and relationships between buildings;
- views, vistas and landmarks;
- the scale and proportions of buildings;
- façade design, such as the degree of symmetry, variety, the pattern and proportions of windows and doors, and their details;
- the scale and proportions of streets and spaces;
- hard landscape and street furniture;
- soft landscape, landscape setting and backdrop;
- nature and wildlife, including water;
- light, shade, sunshine and shadows; and
- colours, textures, shapes and patterns.

I2 Well-designed, high quality and attractive

Well-designed places contribute to local distinctiveness. This may include:

- adopting typical building forms, features, materials and details of an area;
- drawing upon the architectural precedents that are prevalent in the local area, including the proportions of buildings and their openings;
- using local building, landscape or topographical features, materials or planting types;
- introducing built form and appearance that adds new character and difference to places;
- creating a positive and coherent identity that residents and local communities can identify with.

I3 Create character and identity

Design decisions at all levels and scales shape the character of a new place or building. Character starts to be determined by the siting of development in the wider landscape, then by the layout – the pattern of streets, landscape and spaces, the movement network and the arrangement of development blocks. It continues to be created by the form, scale, design, materials and details of buildings and landscape. In this way, it creates a coherent identity that everyone can identify with, including all residents and local communities.

APPENDIX 2: THE BUILDING IN CONTEXT TOOLKIT

The Building in Context Toolkit grew out of the publication **Building in Context™** published by English Heritage and CABI in 2001. The purpose of that publication was to stimulate a high standard of design for development taking place in historically sensitive contexts. The founding and enduring principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal to fully understand context.

The eight Building in Context principles are:

Principle 1

A successful project will start with an assessment of the value of retaining what is there.

Principle 2

A successful project will relate to the geography and history of the place and lie of the land.

Principle 3

A successful project will be informed by its own significance so that its character and identity will be appropriate to its use and context.

Principle 4

A successful project will sit happily in the pattern of existing development and the routes through and around it.

Principle 5

A successful project will respect important views.

Principle 6

A successful project will respect the scale of neighbouring buildings.

Principle 7

A successful project will use materials and building methods which are as high quality as those used in existing buildings.

Principle 8

A successful project will create new views and juxtapositions which add to the variety and texture of the setting.