

SECTION 5.0

HERITAGE IMPACT ASSESSMENT

5.1 THE PROPOSED DEVELOPMENT

No.13 Primrose Hill Studio has a Planning and Listed Building Consent in place for a two-storey addition in the location of the two former garages. The brief to Jamie Fobert Architects was to improve on this consented design ensuring a scheme that was conceived through a full understanding of the Listed Building and the conservation area, leading with a conservation approach that respects, enhances and responds to the most significant aspects of the studio complex.

As artists and creatives, the current owners were automatically drawn to the historical use of the buildings with a desire to retain and revive studio use, it is this desire that has driven a scheme which perpetuates the purpose-built historic use, preserving the open studio volume-the space of highest significance-as a priority.

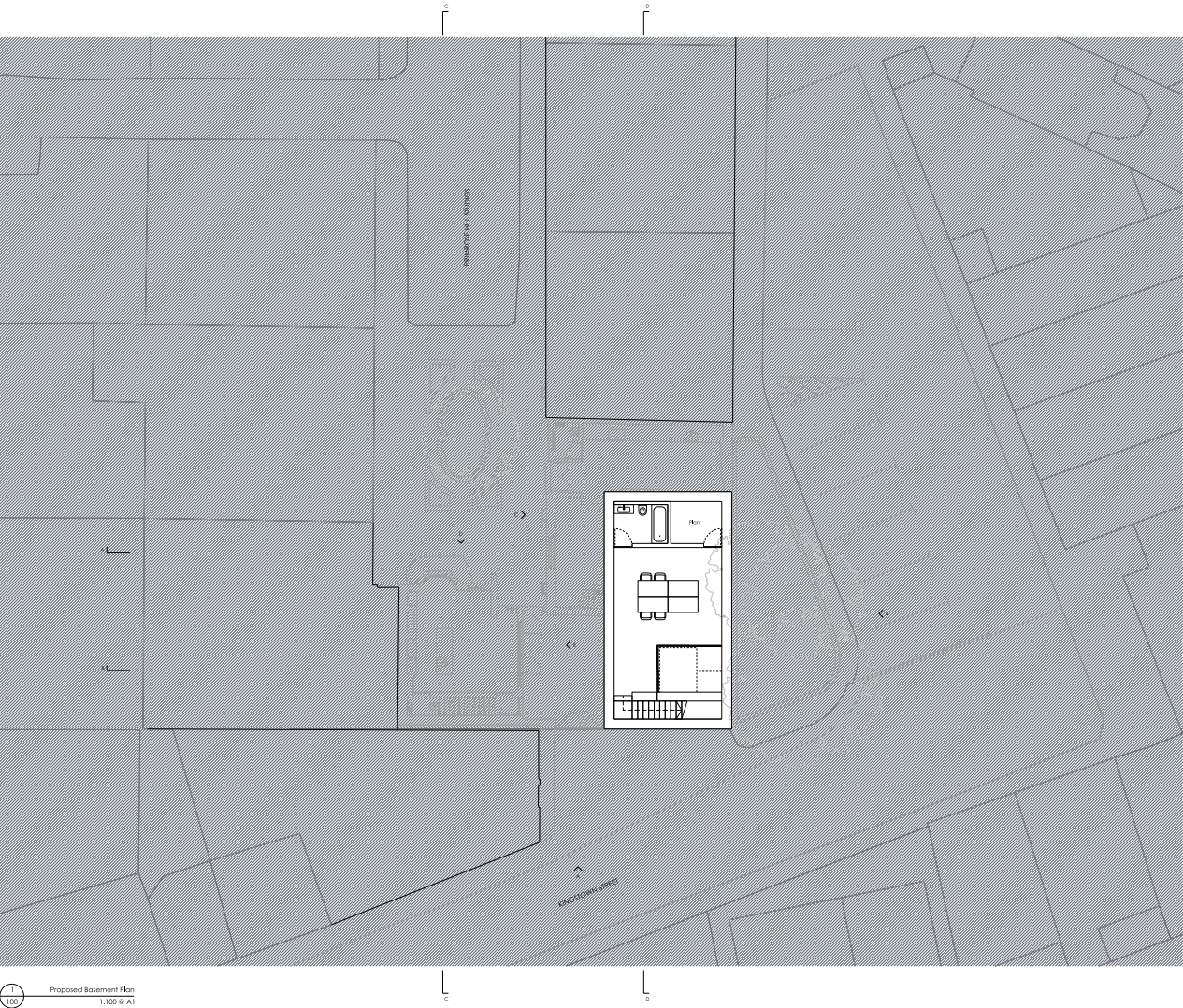
The proposals excavate a new studio hidden from view as opposed to building upwards on this important sensitive corner which articulates the original square 1840 land sale and studio complex and forms part of the the conservation area. In the place of the former garages is a single-story courtyard extension which allows access to the courtyard, basement studio and studio volume. The ancillary studio rooms are reframed to accommodate renewed ancillary use allowing the single volume of the studio to retain its dominance. The former Lodge will retain its residential function and the unsympathetic modern elevation to the rear courtyard will be replaced with a new elevation which takes its cues from the architectural character of the Lodge, nestling seamlessly into the conservation area. Both the Lodge and the Studio will undergo significant conservation repair informed by Condition Survey and Building Conservation Proposals (Purcell , July 2022) to retain and restore lost character, prioritising like for like repair and sourcing matching materials only where existing fabric is beyond repair.

The proposal seeks to carefully refurbish and extend elements of the buildings, making alterations that will ensure they are suitable for 21st Century living and that will secure its future. The design process aims to respect and enhance key characteristics of the Conservation Area and Listed Studio complex in line with the following principles:

- To carefully repair and restore the deteriorated exteriors of the two buildings, using the most historically appropriate detailing and materials to allow the buildings to once again provide a handsome presence and contribute to the significance of the Primrose Hill Studios complex as a whole.
- To update the failing structures, walls and roofs of the two buildings to make them structurally and environmentally sound.
- To provide significant improvements in energy performance, sound insulation and air circulation beyond the current poor conditions.
- To return No.12 back to its former use as an Artist's Studio with some alterations necessary for contemporary living. The proposal seeks to protect the studio from unsympathetic encroachments resulting from domestic use in accordance with Healey's original intentions.
- To enhance the flexible nature of the property and re-assert its historic function by introducing an additional artist studio at basement level.
- To propose a refurbishment and extension that fits comfortably in its surroundings and addresses its protected context in terms of mass, materials and views.

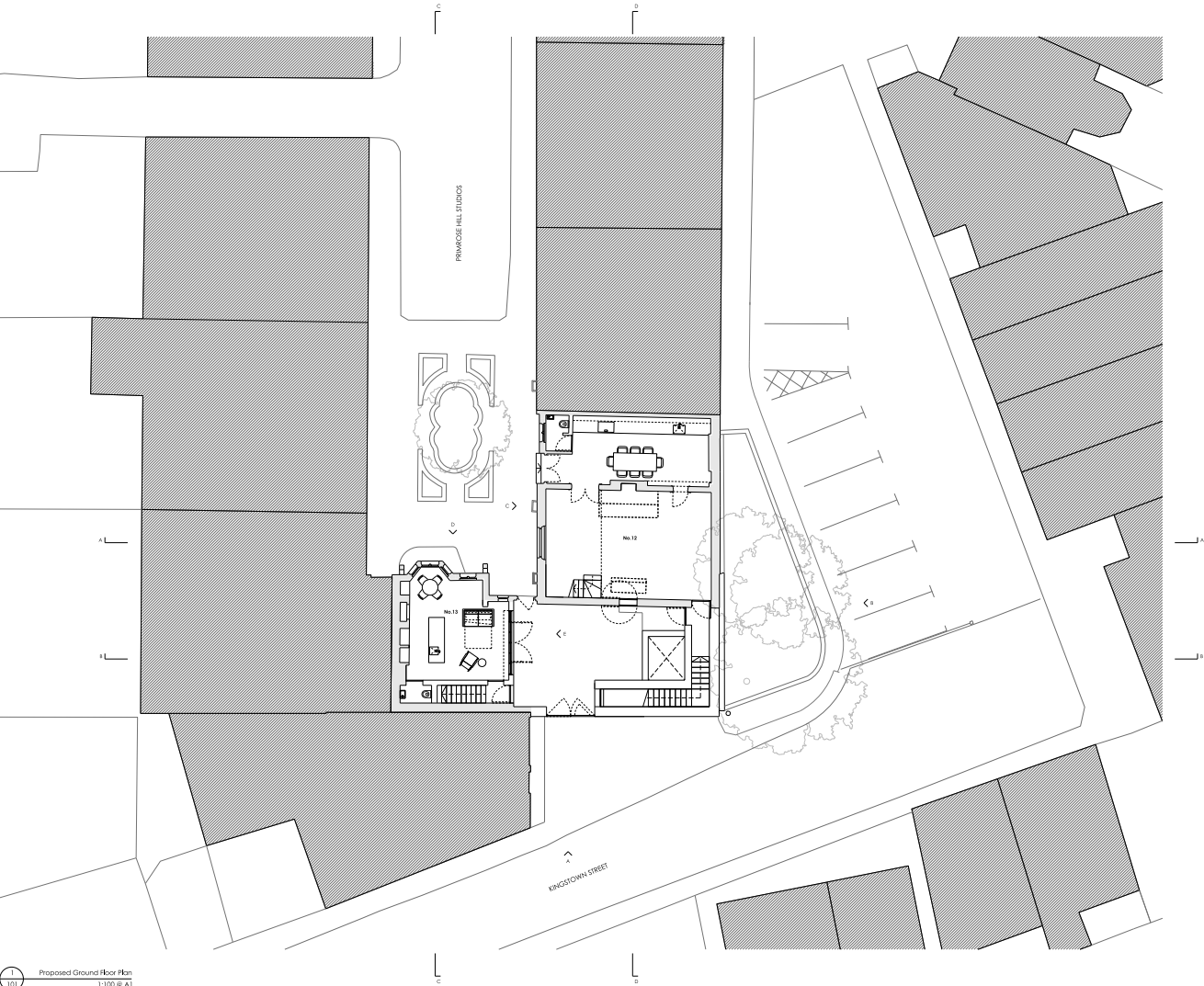
- To use best quality materials to maximise resilience and building life and also minimise the need for future replacements.
- Re-affirm the historic link from Kingstown Street (Formerly Fitzroy Place) to the communal area of the Primrose Hill Studios and site sold in 1840, expressing the corner of Kingstown Street as part of the Primrose Hill Studios complex.

The proposed floor plans and elevations are included on the following pages for ease of reference with full details provided on the submitted drawings and within the Design and Access Statement.

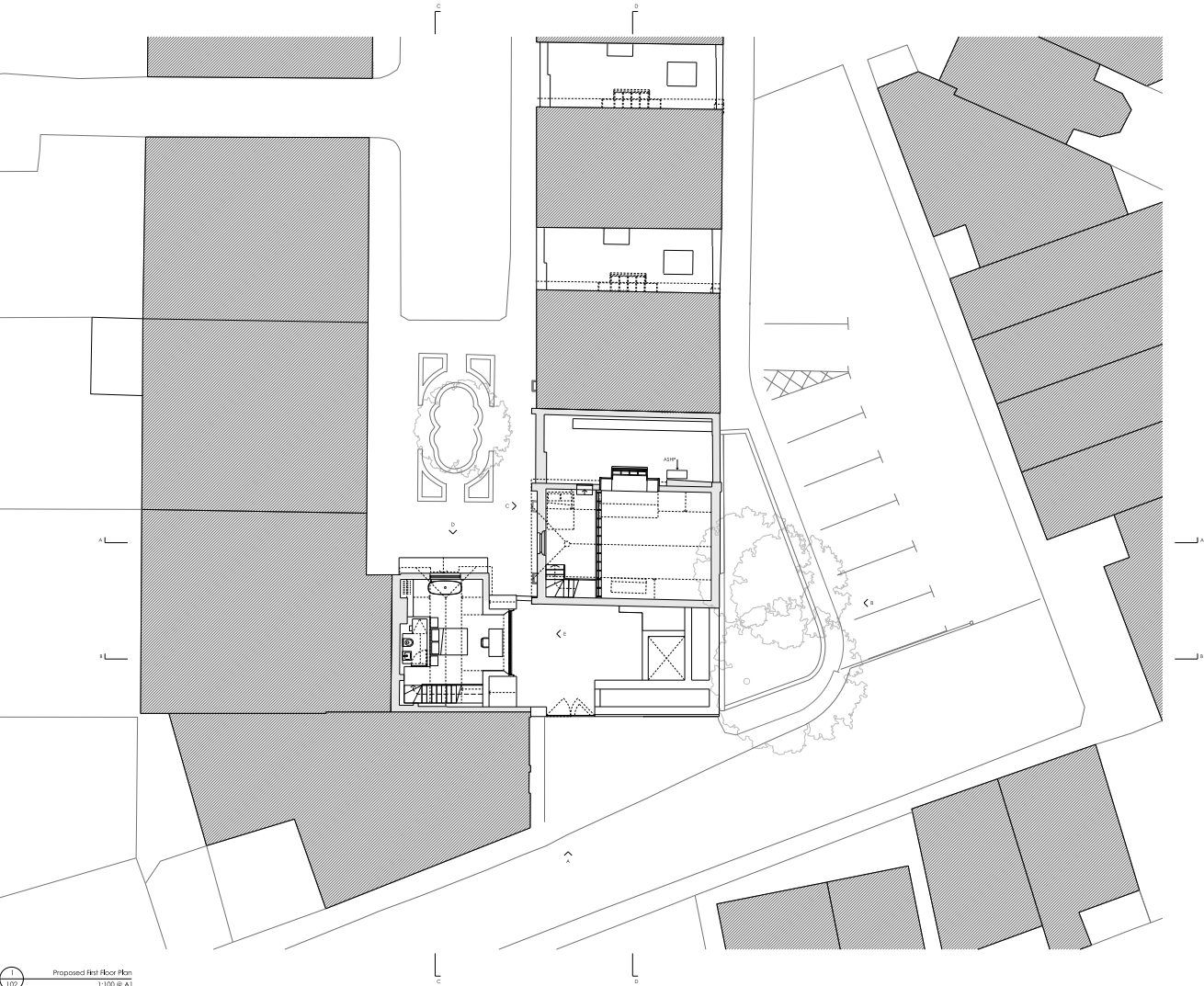


Proposed Basement Plan





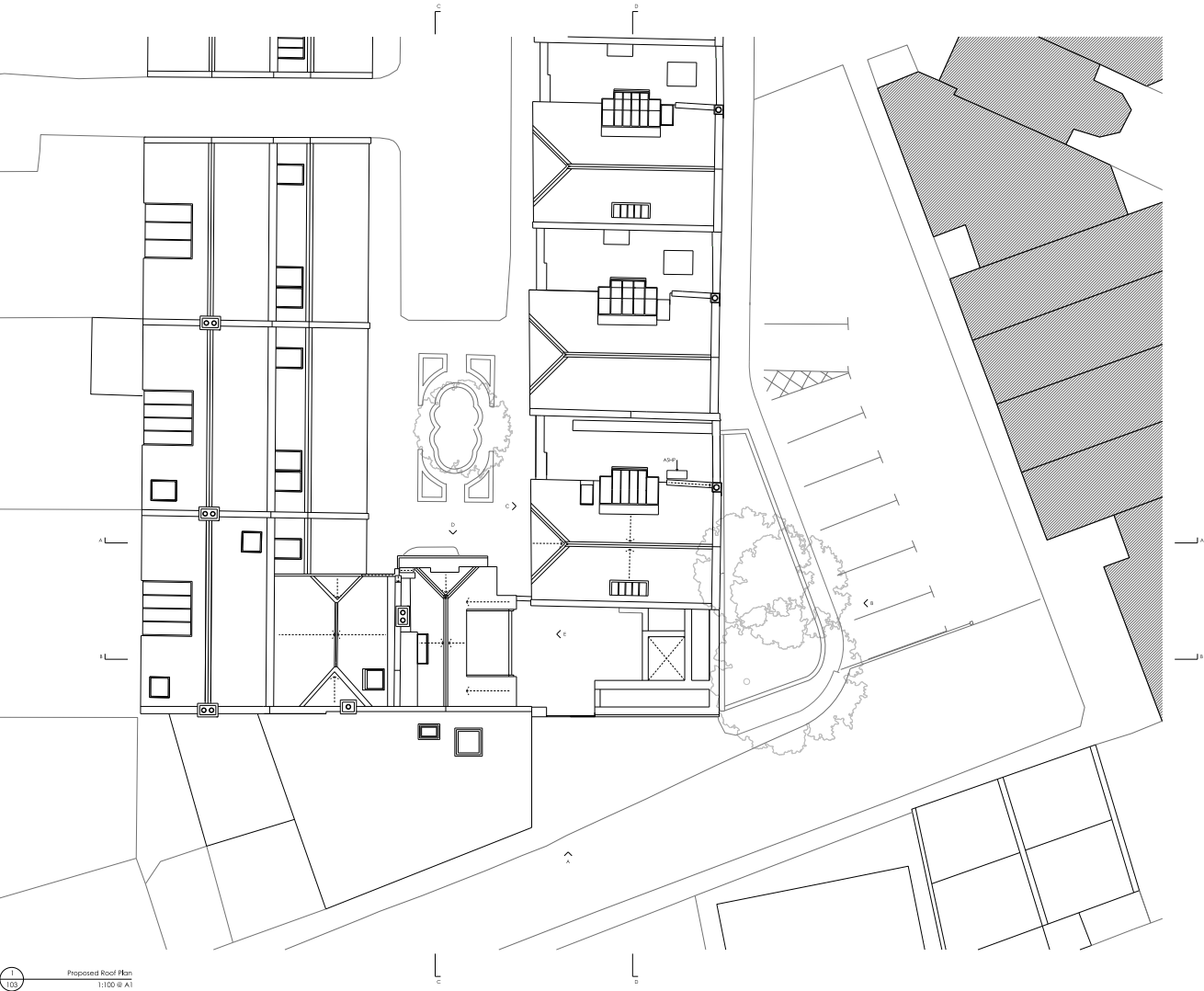
Proposed Ground Floor Plan



Proposed First Floor Plan

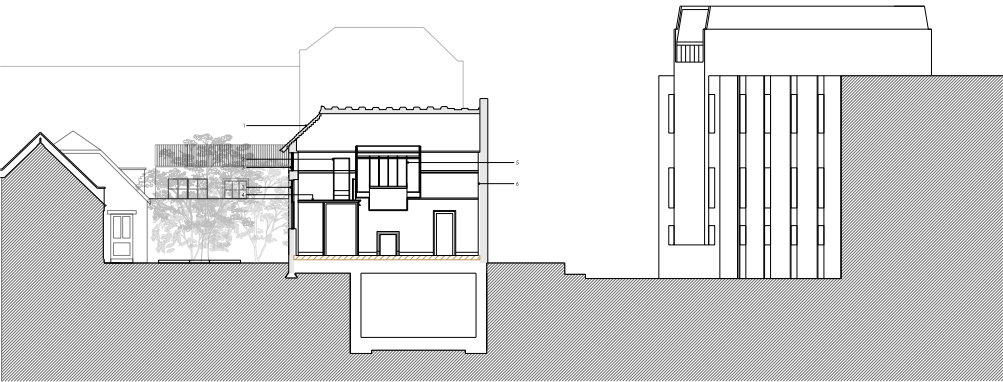


Site Plan 1:250

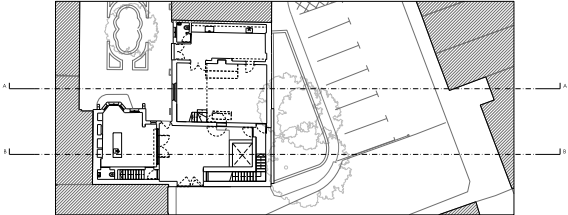


Proposed Roof Plan

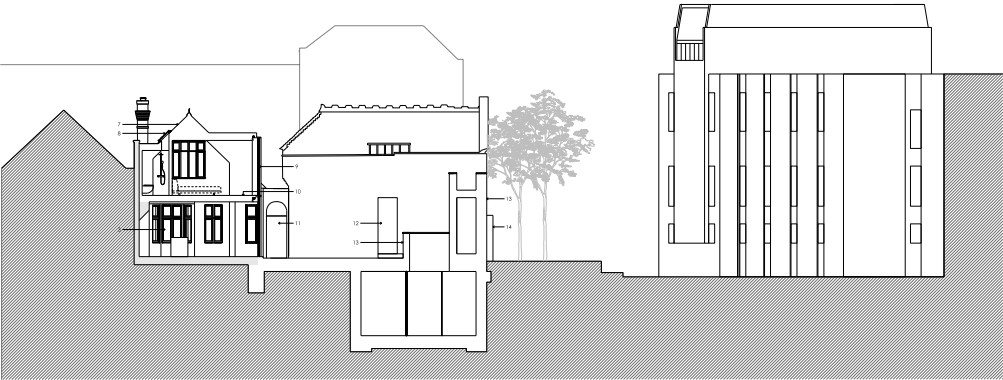
HERITAGE IMPACT ASSESSMENT



Proposed Section AA
1:100 @ A1



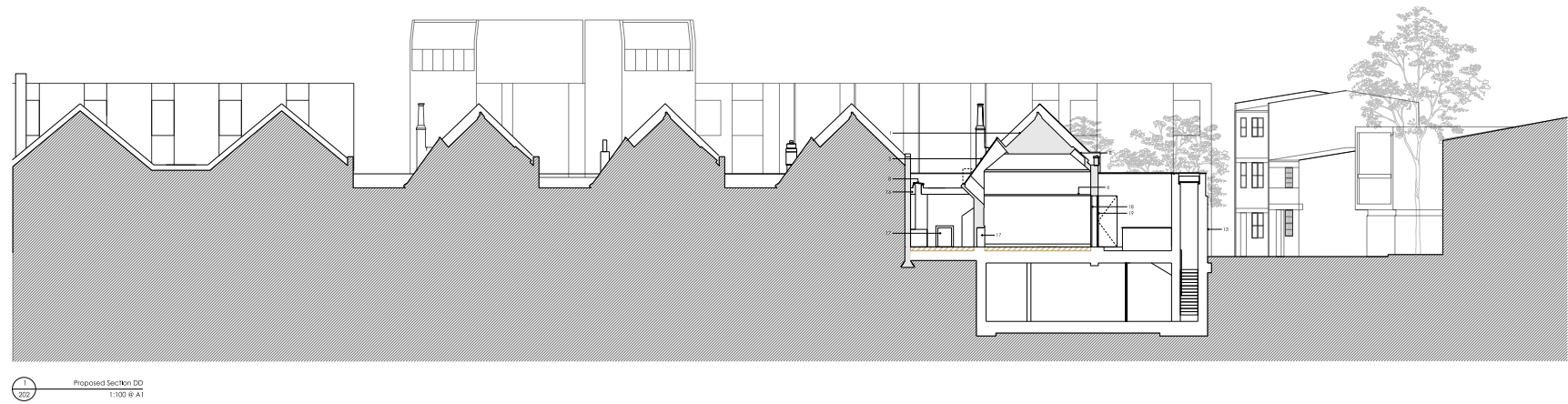
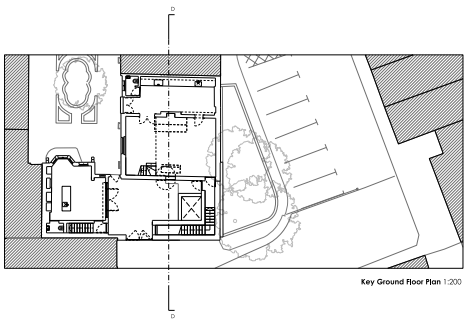
Key Ground Floor Plan 1:200



Proposed Section BB
1:100 @ A1

Proposed Sections

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Proposed Section showing new Basement relative to studio volume

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Site Plan 1:250



Lodge-Proposed South Elevation (Please just include elevation E)

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5.2 HERITAGE IMPACT ASSESSMENT

The impact assessment below is addressed on an area-by-area basis assessing the impact of key design elements. This is followed by an assessment of the impact of strategies that are being applied across both buildings, for example relating to services, window replacements and conservation repair.

The impact assessment draws heavily on the hierarchy of significance set out in the preceding section to inform this assessment.

No 12-Studio

Main Studio Volume

The main studio space is the single most significant element of the building. Many of the studio volumes across the complex have been converted for residential use and have been fitted out with modern kitchens and divisions resulting in a detrimental impact on significance. By contrast, the driving force behind the current scheme is the retention and reinvigoration of historic studio use, an aim which firmly aligns with historic significance. The intention is for the studio volume to be retained as a single open volume for the use of creating art and other creative pursuits, all functions that facilitate this use (kitchen and bathroom facilities) will be housed within the adjacent ancillary spaces to preserve and celebrate the integrity of the studio as a single unimpeded volume.

Internally, the studio features a limited number of architectural features and the client's intention is to retain and restore these as a priority; the main doors, door surrounds and fireplace will be retained. While the original studio is likely to have featured a mezzanine to the internal east wall, at some point in its history, this has been replaced with the current mezzanine to the west wall. While the principle of a mezzanine in this space is aligned with its historic use, and a means to view paintings at a distance and often

to provide basic overnight accommodation, the current mezzanine incorporates intrusive elements. The deep platform structure cuts across the window to the internal courtyard elevation necessitating a modification of the window frame which jars externally, compromising the integrity of this highly significant elevation. The mezzanine features an intrusive modern metal balustrade and the incongruous Regency stair refitted in this location with modern brackets. The mezzanine platform itself also cuts the main entrance to the studio from the entrance hall compromising the integrity of the original door surround. The proposals seek to carefully dismantle the current mezzanine and replace it with a lightweight more sympathetic platform, balustrade and stair allowing the original door frame to remain visible and lightening the visual impact on the open volume of the studio space. The mezzanine will perpetuate the historic use of the platform for viewing and will also facilitate access to a discreet access point out onto the adjacent flat roof over the ancillary rooms required to enable maintenance of the studio skylight and plant.

Other adjustments to the main studio include the insertion of two new openings through the south elevation to facilitate access into the new extension and rear courtyard. While there will be some localised loss of fabric to facilitate these openings, the new doors will be jib doors, fitted flush with the interior architecture to ensure the visual discretion minimising the visual impact on the plain volume of the studio. While it is not believed that there has been a historic exit point through this elevation, it was common during this period to have secondary studio entrances to be used by working visitors and artists models, whose entry was routinely through the service entrance (as is the case with the new access point in this instance) and for the movement of completed works and materials. While this was not a feature of this particular studio, it does acknowledge this historic feature common elsewhere and is therefore considered to be not wholly incongruous with the historic significance and function of the building. Both doors are

proposed to be tall, sitting just under the high-level picture rail, to enable the easy transfer of large-scale artwork in and out of the studios. The doors are proposed to be frameless and plastered to blend seamlessly into the existing blank walls of the south Painting Room wall.

The final proposal that is relevant to the studio volume is the insertion of insulation and new lighting which are assessed in a later section due to their impact across both buildings.

Adjustments to Ancillary Studio Spaces

There will be some reconfiguration to the ancillary studio spaces to provide renewed kitchen and bathroom facilities. The cellular layout of these spaces has been significantly altered historically and is generally of lesser, moderate significance. At the front of the building the original partition between the W.C and coal store has been lost and a door connecting the bathroom and kitchen removed, together with the corridor wall that originally separated a small central kitchen from a corridor. These historic alterations have reduced the significance of these spaces. The current proposals prioritise retaining the ancillary, subservient use of these spaces ensuring the hierarchy of the building is retained. Modifications to the room divisions, roof lights and services across these spaces are necessary to keep ancillary functions away from the main studio volume, retaining its openness and studio use-the primary significance of the buildings.

The fittings are predominately modern throughout, but original doors, architraves, cornices and skirtings survive to the main entrance to the studio and to the rear room, together with two chimneybreasts, and these hold some localised low to moderate significance. It is proposed to reinstate a historically appropriate fireplace within the kitchen.

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A new light slot will be inserted into the flat roof replacing the current square roof opening to illuminate the internal kitchen space. While there is some significance attached to the original square roof opening, the window frame and glazing are modern replacements and are visually intrusive when viewed from the interior. The new light slot follows the precedent for skylights across the buildings and has been designed in a minimalistic style so as not to detract from the simple architecture of the ancillary rooms. While the removal of the square roof light, a feature identified as having low significance represents the loss of a partially surviving original feature, it was ineffective in its original design casting insufficient light into the space below and is prone to allowing water ingress.

Basement Construction

A new basement is proposed for construction partially beneath No.12 and the adjacent rear courtyard. The Primrose Hill Studio complex incorporates a number of studio typologies including a run along the east side which incorporate semi basements beneath the studio volume which have since been dug out to full depth. While No.12 is of a different typology, the historic precedent for basements associated with studio spaces is an established one, often used for the storage of materials or inprogress works of art. The proposal for the basement at No.12 is to achieve various aims, firstly to release pressure on the historic studio volume enabling it to stay unimpeded, but also to create an additional studio space. This expansion of studio space enables the use of the building for the creation of art and also for the collaborative production of art. The social aspect of late 19th century studio homes formed a significant part of their use. Studios were often used to publicise artists work, the concept of 'Open Sunday' established to invite patrons to view and hopefully purchase new work. There was an

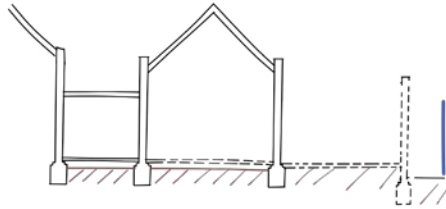
associated use in providing a place for the congregation of artists where ideas could be exchanged facilitated by open volumes which encourage collaboration by their very nature. In these terms, the concept and proposed use of the basement is not incongruous with its historic function, in fact it in many ways could be considered a natural extension of historic use and in this way could be interpreted as a feature which enhances historic significance. The basement also proposes the discreet installation of modern plant such as the tanks supporting an ASHP, reducing the impact on high significance areas of the building.

The physical impact of basement construction on the building must also be considered. The basement construction sequence has been carefully planned to minimise building fabric through the construction and operational phase of the basement. The walls of the late 20th century garages will be removed to facilitate basement construction with high quality brick been kept and reused as appropriate and a monitoring system will be installed on Nos.12 and 13 and on neighbour's properties to ensure

that movements are within acceptable limits throughout the construction. If movement is beyond the trigger marks, works will halt, and prevention measures taken.

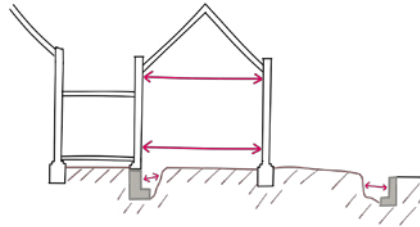
The proposal is to underpin and strengthen the walls of the studio with the new basement walls in a slow and careful sequence. The existing timber ground floor will most likely need to be removed to facilitate this phase of construction. These floorboards make a contribution to the historic character of the studio and are assessed to hold a low significance. It is proposed that these boards are careful lifted along with the floor structure beneath and stored, inspected, and reinstated should they be in good condition or matched like for like. While these floorboards make some contribution to the historic value of the place, they are common and simple in their typology, their value lies more in the contribution they make to the aesthetic quality of the building rather than in the fabric itself. The proposed system of reuse and renewal of floorboards would allow this aesthetic significance to perpetuate.

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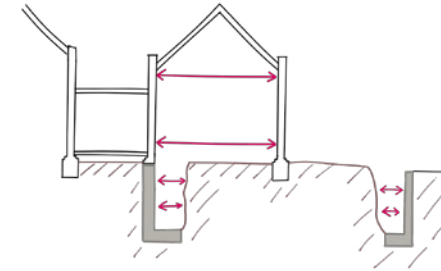
Stage 1 - Site Setup and Enabling Work

- Erect hoarding, set up delivery zone and traffic control measures.
- Install monitoring systems.
- Demolish existing courtyard walls and slab. The timber joist ground floor is to be carefully removed to facilitate the construction.
- Existing floor joists planned to be stored, inspected and reinstated instead of sourcing new graded timber.



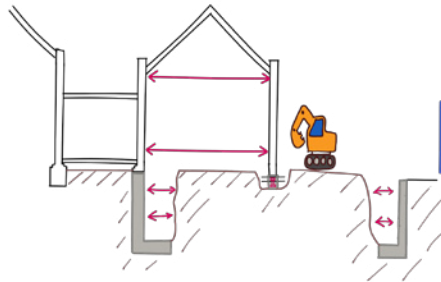
Stage 2 - Underpin (1st Lift)

- Restrain masonry walls at low level and high level with corners braced. Props are to be preloaded.
- Cast new RC wall underpins in hit / multi-miss sequence within shored excavations. A temporary toe is to be incorporated to match the existing foundation width.
- Underpins are to be propped back to central soil mass to maintain stability. All props are to be preloaded.
- Rebar for permanent case waling beam, incorporated in wall profile, is to be included during the casting of the underpins.



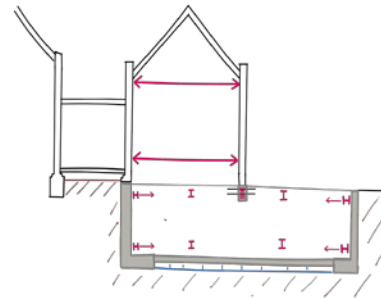
Stage 3 - Underpin (2nd Lift)

- Form deeper shored excavations to basement formation level, cutting out temporary toe and install 2nd lift of underpinning.
- Cast new RC wall underpins in hit / multi-miss sequence with basement slab toe.
- Underpins are to be propped back to soil mass again so there is a prop at low and high level.
- A sump and pump are to be installed to remove water ingress into the excavations. All underpins to be formed in a dry excavation.



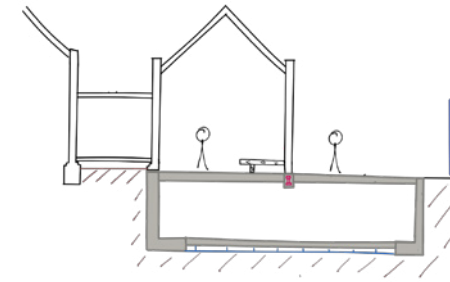
Stage 4 - Form Pynford Beam

- Excavate and install Pynford props within existing wall. A plunge column and needle solution may be preferred by the contractor.
- Cast RC beam with props cast within beam ensuring starter bars for the slab are protruding along length.
- Install waling cross prop members to restrain underpins during soil mass excavation by forming shored trenches within soil mass.



Stage 5 - Excavate and Basement Slab

- Ensure restraint props are in place prior to complete soil mass excavation with props at both high and low level.
- Install below ground drainage and heave solution (as required).
- Cast basement slab.
- Low level props can be removed once the basement slab has cured to sufficient strength to transfer the horizontal thrust loads through the slab.



Stage 6 - Cast Ground Floor Slab

- Cast ground floor slab.
- Once up to strength props can be removed and remaining superstructure works can proceed.
- Timber floor including floorboards reinstated.

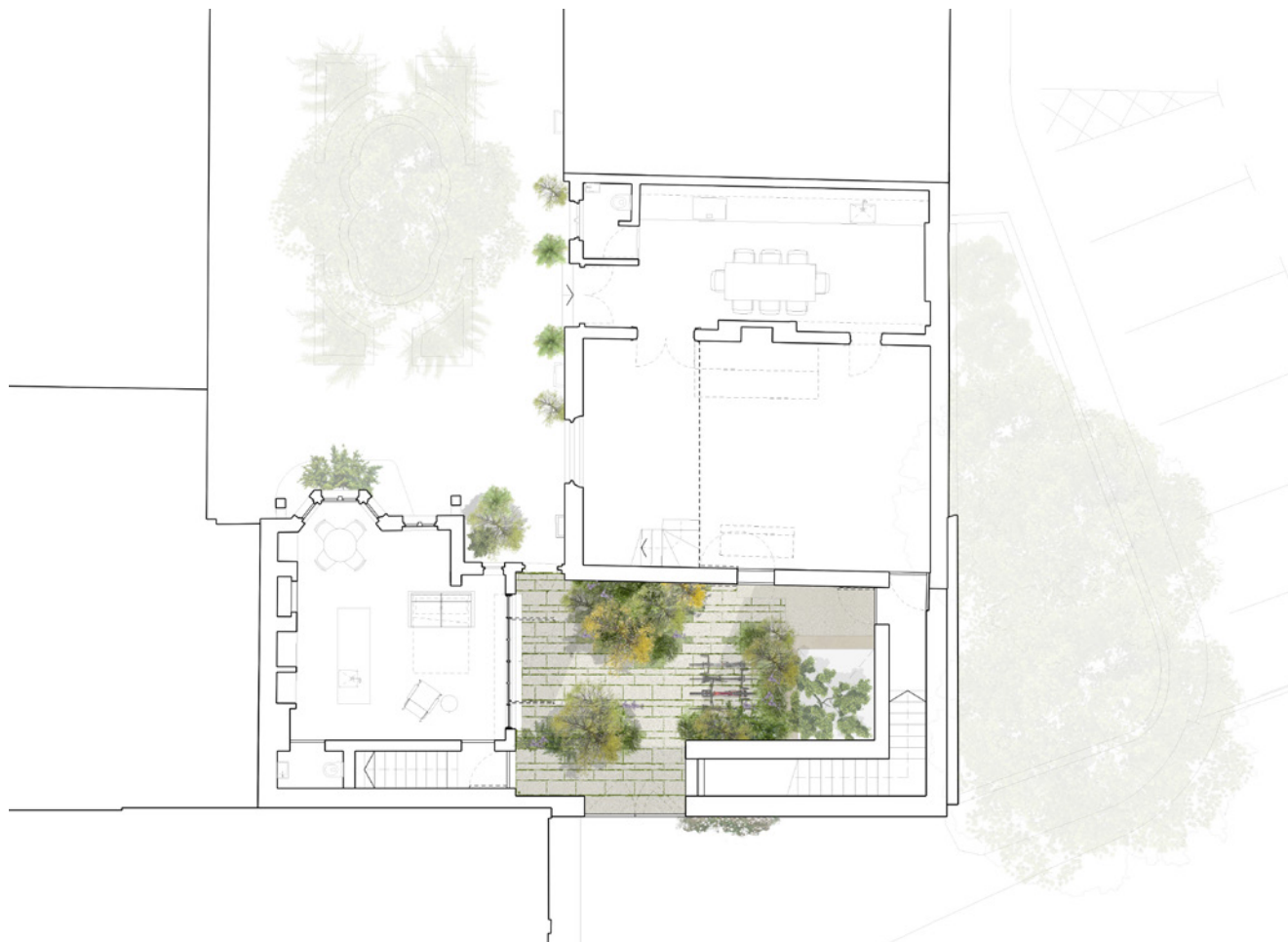
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New Extension within the Rear Courtyard

The proposal seeks to locate the stair to the basement externally, within the adjacent former service courtyard to ensure the preservation of the existing proportions of the Painting Room to No.12. The scheme proposes access to the basement studio directly from the Painting Room from the south-east corner of the studio and access directly onto the courtyard as discussed above. The new extension within the courtyard houses the stair to the basement only, minimising the impact of its footprint and height and allowing for the retention of a significant proportion of the historic rear courtyard as open space and its subservience to the imposing volume of the studio especially when viewing the flank wall from within the rear courtyard.

This arrangement, scale and massing represents a significant improvement on the consented scheme and results in a significant cleaning up of the arrangement of the rear wall to the Studio complex enhancing its aesthetic quality within the conservation area. The retention and renewal of the courtyard which is currently heavily compromised by the modern 20th century garages and deteriorating condition represents an enhancement to the historic and aesthetic value of the building. The courtyard retains its historic intimate and private feel and its use associated with No.13 and acts as a breathing space (and a space from which to appreciate) the transition and flow between historic and new architecture. It is at this important transition point that the differing architecture of the two structures is felt most strongly, the residential character of the former Lodge emboldened by new architecture juxtaposed against the robust functionality of the studio massing. The courtyard space facilitates appreciation of this difference and in so doing enhances the historic and aesthetic appreciation of the two buildings and their interaction with each other.

The scheme seeks to reassert the historic studio boundary along Kingstown Street and retains the historic access point through the lodge courtyard into the interior communal courtyard. These aspects enhance the legibility and appearance of the studio complex within the wider streetscape and the Conservation Area.



Plan showing the courtyard arrangement and the relationship between the historic buildings and minimised courtyard extension.

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The scheme proposes renewal of the south-east garden walls, that will also form the external walls for the new courtyard building and which is currently aesthetically compromised by the inserted modern garage walls and deteriorating condition. The renewed wall will be expressed in a clean, uncluttered and simple form.

Reclaimed London Stock Brick is proposed to the external walls to match the existing and adjacent studio walls, blending effortlessly into the context of the surrounding conservation area and quietly marking the site boundary of Healey's Studio Complex, the square parcel of land sold for development by Lord Southampton in 1840 on 'The Most Important Day in the History of Primrose Hill'. (From article In On the Hill by historian Martin Sheppard https://Issuu.com/onthehill-magazine/docs/oth_june_22_digital_Issuu). This will represent a significant enhancement in the glimpsed visibility of the studio complex from the east and south-east enhancing both the character of the conservation area and the aesthetic quality and historic legibility of the Listed Building group.

The proposed scheme provides an appropriate and handsome prescence on the corner of Kingstown Street, introducing the onlooker to the Primrose Hill Studio Complex beyond.



Current View looking north from Kingstown Street showing the current condition of the boundary wall to the former service courtyard.



Proposed View looking north from Kingstown Street showing the proposed enhancements to the boundary wall to the former service courtyard.

No 13-The Porter's Lodge

Exterior Arrangement

The Porter's Lodge makes a significant contribution to the Studio complex by virtue of its difference expressed through its residential character. It is clearly marked out as a residential property and by default is a building that facilitates the operation and maintenance of the site. The inner courtyard-facing elevation survives well with some replacement and modification to the windows, it will be enhanced through considered conservation repair as part of the scheme and its visual integrity enhanced by the replacement of the modern unsympathetic gate connecting the inner and rear courtyards and the removal of surface mounted and strung services and the replacement of the faulty Victorian sewer.

The roof slope and overhanging eave form a distinct part of the character of the roof when viewed from the internal courtyard. In the current configuration the legibility of the south-east slope of the roof is heavily compromised by the late 20th century inserted dormer. This dormer is proposed for removal as part of the reimagined south-east façade. This design move will facilitate the restoration of the slope of the roof and overhanging eave at the south-east corner of the building returning the legibility of the historic roof line and with it the cottage style residential character from this important viewpoint. This is considered to represent a key enhancement to aesthetic and historic significance, elevating the high significance of the internal courtyard and views from it and significantly enhancing the historic and aesthetic legibility of the lower significance rear courtyard which has suffered from heavy visual deterioration.

This benefit is further carried into the re-imagined south-east (rear courtyard fronting) elevation to the Lodge. The original elevation featured a low-slung eave punctured by a single diminutive window at first floor level and was secondary and ancillary in its relationship with the main internal courtyard of the building reflecting the functionality of this elevation and its relationship with the service yard. This fabric and character were obliterated by World War II bomb damage. The current façade represents a significant rebuild of the elevation reaching into the internal floor plate. This rebuild resulted in the loss of the roof slope through the insertion of the over-scaled dormer which has resulted in the wholesale loss of the residential and cottage style character when read from the rear courtyard and externally in views from the conservation area. This represents a significant opportunity for enhancement of the Lodge, the Listed Building Group and the Conservation Area.

The proposed elevation returns these lost elements of historic character. The new elevation will read as in insertion into the historic elevation and will facilitate the reinstatement of the historic roof eave at the north-east and south-east corners, repairing the roof in like-for-like slate and reinstating views of the terracotta roof finial. The fenestration has been carefully selected to achieve a balance between residential character with a nod towards the studio skylights featured across the complex. The proposed window, as with the original fenestration shown in pre-war photographs, breaks the eave line reintroducing a memory of this historic character in a wholly modern way. The proposed skylight nods towards the full-height westerly facing skylights of studios 1-6 in particular.



Existing East Elevation



Proposed East Elevation

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Interior Arrangement

The primary significance of The Lodge lies in its physical position and relationship to the rest of the studio complex, and what this tells us about how the studios were originally serviced and functioned on a day-to-day basis. Architecturally, this is best expressed through the building's diminutive size and position, and the original composition that broadly survives on the front elevation, which is generally of high significance. These elements as assessed above are preserved and enhanced through the proposed scheme. Internally the Lodge has undergone significant reconfiguration and sub-division to accommodate the installation of modern kitchens and bathrooms and following significant WWII bomb damage. The result is that the floor plan is heavily modified from its original form with no internal historic fixtures and fittings surviving, the fit out and finish has a wholly modern feel and is considered to be of low or negligible heritage significance.

The proposals seek to reconfigure the interiors, re-positioning the adapted staircase to the side of the building and opening up the interior spaces for modern living. While this openness did not apply to the cottage style interiors of the original lodge, these have been long lost. While the opening up of spaces and potential localised loss of historic fabric has the potential to have a detrimental impact on the historic integrity of the building, this impact is minimised by the low significance attributed to the internal layout resulting from historic change, bomb damage and the enhancements promoted by the reimagining of the new east elevation and conservation repair to the high significance inner courtyard elevation.

Proposed Works Applicable Across Both Listed Buildings

Conservation repair

Conservation repair forms a significant part of the proposals, aligned with the client's desire to reflect and enhance the historic integrity of the buildings. A programme of prioritised repair, informed by a detailed condition survey is set out within the Condition Survey and Conservation Proposals prepared by Purcell in July 2022. This identifies features in need of repair and sets out a philosophy for like-for-like repair, retaining and reusing materials where possible. Roof slates will be retained and replaced with like-for-like new slate tiles where unsalvageable. The same philosophy is applied to the floorboards within the studio spaces which will need to be lifted to facilitate basement construction. They will be carefully removed, repaired and stored ready for reuse and matched with new boards where unsalvageable. Externally brick work will be repaired locally where needed to arrest decay and retain the visual integrity and patina of age which defines the character of the building. Where historic features have been lost, for example the clay roof finials and ridge tiles, these will be replaced adding a cohesiveness to the wider building group.

Collectively these repairs are considered to represent a considerable enhancement to the building resulting in the elevation of its significance and importantly improving its condition and survival.

Roofs

The flat roof to the ancillary spaces to Studio 12 needs to be replaced due to irreparable damage caused by water ingress. The roofs across the building will largely be rebuilt and new insulation inserted to reduce the environmental impact of the building. The existing roof tiles will be reused where possible and replaced like-for-like where beyond salvage. The resulting roofscape will there match those across the studio complex and will enhance the aesthetic and communal value of the buildings through their enhanced condition.

Window Replacement

The whole concept of the studio complex was built around maximising even and good quality light to aid the artistic process. The placement and scale of windows across the studio building in particular make an important contribution to the building's significance. Of particular note is the large skylight to the north pitch of the studio roof. While the majority of the window openings across both buildings survive, most frames have been replaced with modern insertions or adapted from their original form and they survive in variable state of repair.

The proposals seek to replace all window frames across the buildings with appropriately profiled double glazed units required to achieve an acceptable and improved energy performance. Alternative approaches such as secondary glazing have been considered and discounted due to their visual impact internally and externally, particularly with regard to the main studio light.

Services

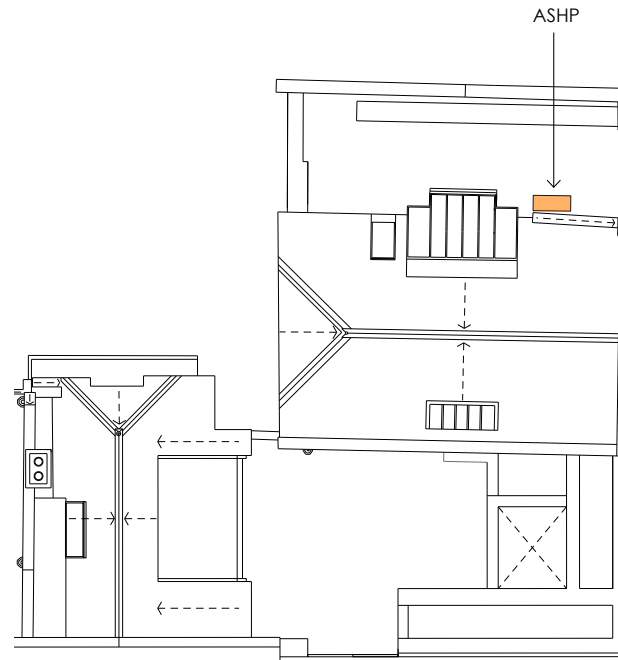
Incoming services

The buildings are currently served by out-of-date services which provide inadequate heat and lighting. The buildings over time have gradually accumulated unsympathetic additions to the building including exterior wall mounted cabling, television aerials and lighting. Indeed, the mains electricity and phone cables serving the studio complex are facilitated by overbearing cabling which runs through the courtyard and along the north wall of Studio 12. These accretions are visually intrusive and detract from the architectural quality, condition and integrity of the buildings. The current proposals seek to rationalise existing services, consolidating both buildings into the same supply, burying them underground and in so doing increasing the aesthetic and communal significance of the building group. Cracked and leaking Victorian sewer pipes which run beneath the rear courtyard and which service the entire Studio Complex will also be replaced to benefit the Studio community.

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Plant

Various types of technologies were considered to heat the building and provide hot water including wind power, solar power, air source heat pumps and ground source heat pumps. Advantages and disadvantages of each technology in relation to the development, environmental factors and the constraints of the Listed Building were considered. The outcome was a proposal for the installation of an air source heat pump which will support an all-electric strategy, significantly reduce operational carbon emissions and support the national policy and likely ban on the installation of new or replacement fossil fuel boilers. In order to work efficiently, the ASHP requires an open area to front of the unit and access for maintenance which limits the possible locations for its installation. Various roof level locations were considered and tested for impact. The proposed location on the northern flat roof of the studio has been selected to be the most viable to meet these practical obligations but also to ensure its invisibility from the studio complex and the conservation area. The unit itself has been selected to be as small and discreet as possible and its level of invisibility has been tested through the preparation of rendered views taken from within the courtyard to Primrose Hill studios and from the wider conservation area as illustrated below. The unit has also been positioned to negate its visibility through the studio rooflight from within the studio interior; consequently, it is considered that there is no visual impact on the Listed Building or the conservation area as a result of its installation. The ASHP will feed equipment located in the basement without affecting the historic spaces.



Proposed Roof Plan. An ASHP is proposed to be located on the flat roof of No. 12



Images showing invisibility of proposed roof plant from the Listed Building complex, the Conservation Area and wider streetscape

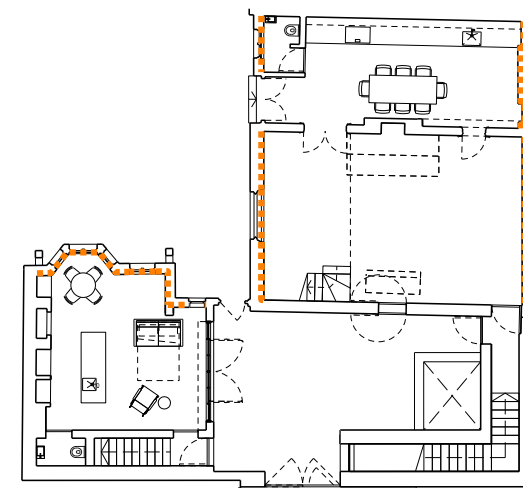
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Heating and Insulation

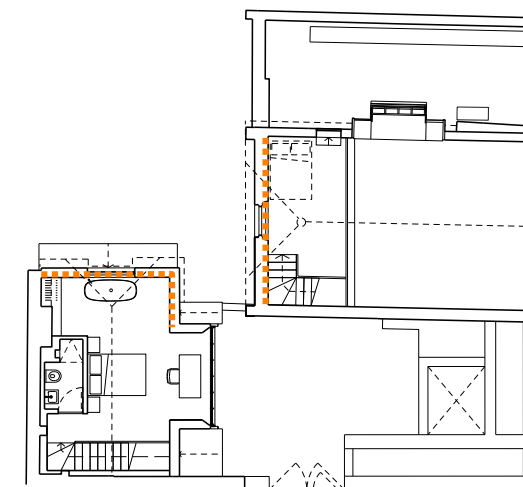
It is proposed to improve the environmental performance of the building using a mixed system of electric radiators, underfloor heating and wall surface insulation to avoid detrimental impact on fabric. Underfloor heating is proposed with the new basement spaces and within the reinstated floor to the main studio volume reducing the number of wall mounted radiators necessary in this highly significant space. A mix of radiators and trench heaters will be deployed across No.13.

The impact of visually intrusive and over-scaled plant is minimised by the discreet use of insulation to the internal walls of the studio. There is currently a substantial amount of heat loss within the buildings. In order to achieve an improved and suitable energy performance for living, some walls are proposed to be internally re-lined with insulated plasterboard. The north and south walls of the No.12 Painting Room are not proposed to be re-lined in order to protect the original proportions of the room. All original skirting and picture rails within No.12 are proposed to be carefully removed and re-applied so there is no change in the visual perception of the space. No such original or historic skirting and picture rails exist in No.13 in areas where interior wall insulation is proposed. The wall insulation will be fixed to wall mounted timber batons to an overall build-up of approximately 100mm. This solution has been carefully considered to balance the

environmental needs of the building (preserving its condition from deterioration), to minimise impact on fabric and to ensure that the wall build up would be visually imperceptible in the way the interior spaces are read, particularly within the main studio volume. While this solution does not have a negligible impact in heritage terms, this impact has been minimised by the careful selection and placement of materials and methodologies and will contribute to the ongoing sustainability and survival of the building into the future alongside retaining its use as a single volume. In these terms and as part of a large package of heritage enhancements, this impact is considered to be acceptable.



Proposed Ground Floor Plan. Proposed wall to internally insulate as indicated



Proposed First Floor Plan. Proposed wall to internally insulate as indicated

HERITAGE IMPACT ASSESSMENT

5.3 CONCLUSION

This Heritage Impact Assessment is informed by a sound evidence based established through archive research and on site analysis of the studio Complex. This research and analysis helped to establish a hierarchy of significance for the site based on Historic England Principles assessing the site from multiple perspectives including evidential, aesthetic, historic and communal (*Conservation Principles*, 2008). This assessment established a number of characteristics which carried the significance of the place, primary among these being, the open volume of the Painting Room, the position of the buildings fronting onto the communal courtyard and their shared design and materiality along with the perpetuation of the intended and historic use as artist's studios.

There are a number of aspects which have devalued this significance over time for example the rebuilt Lodge elevation to the private courtyard and likely internal reconfiguration of the interior following World War II bomb damage and the current deteriorating condition of the building. The current scheme seeks to strengthen and address these lost significances, to reimagine the studio and lodge as places of artist endeavour given new insights into the lived experience of the artist and their studio.

The proposed scheme has been evolved prioritising a significance led approach, an approach which prioritises retention of the open volume of the high significance studio Painting Room. Design decisions are embedded in a sound understanding of the needs of the clients as residents and artists and clarity gained through research on what makes the buildings and their setting unique and special in heritage terms.

The shared synergy and focus between client, architect and heritage consultant has resulted in a scheme which prioritises conservation repair and treasures the high significance elements of the buildings, the studio volume and its associated function, the integrity of the inner courtyard facing elevations and the contrast between residential and studio character. New elements have been carefully and considerately added to sit respectfully with the history of the site at the same time as perpetuating its use. The aim has been to achieve an elegant and modest addition to the Primrose Hill streetscape and studio complex which enables the restoration of the historic buildings and allows their historic character to remain dominant while creating a sustainable home fit for its intended purpose- enduring creative practice. While some aspects of the scheme challenge heritage significance, each design move has been carefully planned out to mitigate this impact and to promote and enhance what is most special about the Listed Buildings and conservation Area. On balance the result is a scheme which perpetuates and celebrates heritage significance and secures its future for generations to come.

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APPENDIX A

LIST DESCRIPTION

PRIMROSE HILL STUDIOS

Grade: II

Date first listed: 30 June 2004

798-1/0/10317 FITZROY ROAD 30-JUN-04 (Off) Primrose Hill Studios II Artists' studio houses. 1877-82. Alfred Healey, builder. Stock brick with red-brick trim. Prominent slate roofs with half and whole hips. Four house types arrayed around a rectangular courtyard. Earlier west build represented by two types (Nos.1 and 6 and Nos.2-5). Later east build by two more types (Nos.7 and 8 and Nos.9-12). Further variation in The Lodge, said to have been built as servants' quarters. Varied and picturesque cottage version of Queen Anne idiom, reflecting grander artist's studio houses. Nos.2-5 are a row divided by the entrance alley. Double pile with asymmetrical M roofs. Lower front range living spaces, taller rear range galleried studios with north-west facing studio windows in back or garden elevations and roof slopes. Single-storey asymmetrical four-bay fronts, four-panel doors, small glazing-bar casement windows, some replaced. Party-wall parapets, tall red-brick chimneys. Nos.1 and 6 at ends of west group step forward to close court. Entrances in returns to slightly taller end blocks, half-hipped roofs. Leaded-light dormer window to east on No.6; No.1 abuts The Lodge, a two-storey house, with a canted-bay window under a pentice, eaves to half-hipped roof interrupted by eight-light window. Nos.7-12 have smaller footprints and no gardens. Single-storey top-lit studios, variegated rooflines with oversailing

eaves. Nos.7 and 8 (to north) a mirrored pair with semi-basements and pyramidal roofs. Entrances together, recessed in deep porches and up flights of steps, part-glazed, margin-lit doors. Tall galleried studio rooms, single large windows with eight-light fixed panes over twin plate-glass sashes. Low-level small casement windows. To rear plain stock-brick two-storey elevation, each house having three bays of sash windows over doorways, some blocked. Nos.9-12 could not be lit from the rear and so are differently disposed and smaller; basements not evident. Single-bay studios have large windows, four-pane glazing surviving at No.11. Half hips to each roof, large rooflights in north slopes. Linking low flat-roofed entrance bays, double part-glazed doors, small windows, dentil courses. To rear blind stock-brick gabled walls. Interiors have not been inspected. No.8 can be seen from courtyard to have studio gallery with balustrade of pierced splat balusters. First tenants included the painters John Dawson Watson (No.1), Joseph Wolf (No.2), John William Waterhouse RA (No.3), John Charles Dollman (No.5), P. M. Feeney (No.7), Charles Whymper (No.8) and Lawrence George Calkin (No.10). Arthur Rackham lived at No.3 in 1905- 6, when some of the illustrated books for which he is best known were published, and at No.6 after 1920 when his main home was in Sussex.

Subsequent tenants have included Lord Methuen RA, Patrick Caulfield and John Hoyland. Sir Henry Wood, musician and conductor, also lived here.

Primrose Hill Studios are listed as an early, attractive and well-preserved example of speculatively built artists' studio houses.

APPENDIX B

PLANNING POLICY AND GUIDANCE

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

[...] in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.

Similarly, section 66 of the above Act states that:

In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall 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.

Similarly, section 72(l) of the above Act states that:

[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Local Policy

Camden Local Plan

The local plan was adopted by the Council on 3 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. The following policies are relevant:

Policy D1 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";
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- 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;

- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- 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,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Excellence in design

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under “Policy GI Delivery and location of growth” will be provided through high quality contextual design.

Policy D2 Heritage

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.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. 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:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- 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.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. 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.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. 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.

Policy A5 Basements

The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a. neighbouring properties;
- b. the structural, ground, or water conditions of the area;
- c. the character and amenity of the area;
- d. the architectural character of the building; and
- e. the significance of heritage assets.

In determining proposals for basements and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and

structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan. The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- f. not comprise of more than one storey;
- g. not be built under an existing basement;
- h. not exceed 50% of each garden within the property;
- i. be less than 1.5 times the footprint of the host building in area;
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- k. not extend into or underneath the garden further than 50% of the depth of the garden;
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- m. avoid the loss of garden space or trees of townscape or amenity value.

Exceptions to f. to k. above may be made on large comprehensively planned sites. The Council will require applicants to demonstrate that proposals for basements:

- n. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
- o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- p. avoid cumulative impacts;
- q. do not harm the amenity of neighbours;
- r. provide satisfactory landscaping, including adequate soil depth;
- s. do not harm the appearance or setting of the property or the established character of the surrounding area;
- t. protect important archaeological remains; and u. do not prejudice the ability of the garden to support trees where they are part of the character of the area.

The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding. We will generally require a Construction Management Plan for basement developments. Given the complex nature of basement development, the Council encourages developers to offer security for expenses for basement development to adjoining neighbours.

Primrose Hill Conservation Area

The Primrose Hill Conservation Area was designated by London Borough of Camden in 1971 and extended to include the north part of Erskine Road in 1985. The Primrose Hill Conservation Area Statement was adopted in December 2000. The Statement describes the character of the area, provides an outline of the key issues and identifies development pressures which are currently a cause of concern. The statement also sets out the key policy framework relevant to the Conservation Area and formulates specific guidance for it.

For the purposes of this Statement the Conservation Area is divided into four sub-areas entitled:

- Regent's Park Road South
- Central Area
- Regent's Park Road North
- Gloucester Crescent

The study site is located in 'Sub-Area Two: Central Area', which is described as follows:

'This sub area is located to the centre of the Conservation Area and is largely flat with a small incline from south east to north west. It is neighboured to the north by the railway line and to the south east by Regent's Canal.'

'The area is urban in character with a high density of development with sporadic areas of greenery. It is dominated by long terraces of mid-19th century houses that are set back from the pavement with small lightwells and railings to basement areas, although there are some earlier and later buildings within the area.'

The Conservation Area Statement also mentions Primrose Hill

Studios and identifies them as making a positive contribution to the significance of this designated area:

The Primrose Hill Studios are a group of 12 buildings clustered around a quiet courtyard to the centre of a block. These buildings are constructed in the Arts and Crafts style with hipped roofs and are modest in scale, being a maximum of two storeys in height...

... The distinct quality of Primrose Hill is that it largely retains its homogenous mid-late 19th century architectural character. For this reason, most of the 19th century buildings make a positive contribution to the character and appearance of the Conservation Area.

The Conservation Area Statement was adopted before Primrose Hill Studios was listed Grade II (in 2004).

Regional Policy

The London Plan (March 2021)

In March 2021 the Mayor adopted The London Plan. This is operative as the Mayor's spatial development strategy and forms part of the development plan for Greater London. Policies pertaining to heritage include the following:

Policy HCI Heritage Conservation and Growth

(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well- designed, beautiful and safe places, with*

accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

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

PLANNING POLICY AND GUIDANCE

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

- a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) *the desirability of new development making a positive contribution to local character and distinctiveness*

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 199 the framework states the following:

...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 200 that:

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.*

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 201 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) *the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) *conservation by grant-funding or some form of not for profit, 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*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following:

202. 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.

The Framework requires 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. Paragraph 206 states that:

... 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.

Concerning conservation areas and world heritage sites it states, in paragraph 207, that:

Not all elements of a Conservation Area or World Heritage Site 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 200 or less than substantial harm under paragraph 201, 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.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) 2021 and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

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. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

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

- **architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **historic interest:** An interest in past lives and events (including pre- historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 199-203 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 199-203) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the

adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms 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 (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 200).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Other Relevant Policy Documents

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

Historic England: Conservation Principles and Assessment (2008)

