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Our Ref: 6801HER

Dear Sir/Madam

Heritage Note in Relation to 'Demolition of existing rear terrace; construction of single storey rear extension; new dormer addition to roof; new double-glazed windows and other associated works to the property' at 22 Tanza Road, London, NW3 2UB

This Heritage Note has been prepared on behalf of a private client. The statement relates to the proposed single storey rear extension, new dormer addition to roof, double glazed windows and associated works at No.22 Tanza Road, London NW3 2UB. The site falls within the jurisdiction of LB Camden.

This Note has been prepared by Niall Hanrahan of Heritage Potential. Niall has a MSc in Historic Conservation and is also MRTPI accredited. This joint heritage and planning specialism allows him to effectively balance the public benefits of proposals against any identified harm to heritage assets.

Site Area and Description

The application site comprises a two and a half storey detached dwelling which has been identified as a positive contributor within the South Hill Park Conservation Area.



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Proposals

- Demolition of existing rear terrace and replacement with new single storey extension.
- Rear dormer in zinc with double sash windows.
- Double glazed timber windows.



Significance and Justification

No.22 Tanza Road is a tall two and a half storey dwelling built in red brick with part hip, part pitched roof with front and rear gables. To the front, the property has a two storey bay with simple sash windows. The wide front door has a porched entrance. The slate roof contains projecting two rooflights. A single storey red brick garage sits to the right hand side, providing a gap in the built form at first floor level and a vista through to the rear of properties along Parliament Hill.

The property's frontage undoubtedly contributes positively to the general character of the Conservation Area. This is achieved through a familiarity of materials, styles and high quality appearance.



The rear of the property is fairly simple in design with three sash windows set within a red brick façade. Again, the slate roof has two rooflights. At ground floor level is a timber veranda structure with corrugated plastic roof, which is in poor condition and is a detracting feature of the property.

Extension

The proposals allow for the removal of the detracting veranda and its replacement with a single storey brick extension. The proposed design includes brick coggling to provide a textured and interesting elevational treatment. Large glass windows break up the brickwork and allow for a connection between the living space and the garden. A centralised rooflight is proposed within a green roof.

The scale and form of the extension are appropriate and avoid any sense of over development. The removal of the detracting veranda and its plastic roof should be wholly welcomed and the overall design of the extension, in high quality materials, represents a significant enhancement to the appearance of the property and its contribution to the conservation area.



Overall, it is considered that the extension is subservient to the main building, utilises materials characteristic of the area and provides a high quality response to the removal of the detracting veranda.

Dormer

The proposed dormer is discreet and nestles into the rear slope of the hipped side of the roof. The pitch and gable adjacent allow the dormer to nestle into the roof without becoming a dominant feature. The addition sits well below the ridge line and replaces two rooflights of poor quality. The addition also means the removal of the brick chimney stack however it is understood that this could otherwise be removed without consent, and it is the least prominent of the building's chimney stacks.

The conservation area is characterised by dormer additions and the proposals will be consistent in that regard. It is pertinent to note that the proposed zinc dormer would be of considerably better quality than other examples found within the local area.



Double Glazed Windows

It is understood that the building is notably inefficient at present. Upgrading the sash windows to double glazing would provide a significant uplift in thermal performance and provide a more sustainable home. Camden Council declared a climate emergency and it should be expected that any enhancement, no matter how small, should be welcomed to help achieve their sustainability targets.

In terms of appearance, it is generally accepted across the board that slimline double glazing has a negligible impact on appearance within conservation areas. As such, the proposals should be welcomed and would preserve the significance of the area.



Conclusion

Overall, it is considered that the proposals are of a reasonable scale, ensuring subservience with the main property, and allowing for a detracting feature to be replaced with a high quality extension. The proposals demonstrably comply with the relevant national and local planning policies and considered to enhance the building and its contribution to the South Hill Park Conservation Area, in line with Paragraph 72 of the 1990 Act.

Yours sincerely,

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Legislation, Policy and Guidance

Heritage Legislation

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislation and foundation on which further policy, and guidance relating to the conservation of the historic environment is built. Section 66 of the Act relates to the 'general duty as respects listed buildings in exercise of planning functions', with Section 66 (1) stating that when deciding whether to grant planning permission for a development, special regard must be given by the local authority to the "desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".

Section 72 of the Act relates to the 'general duty as respects conservation areas in exercise of planning functions', with Section 72 (1) of the Act stating that in exercising planning functions, "special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area".

NPPF: Heritage (2021)

The National Planning Policy Framework, with which all Local Development Plans must comply, constitutes the national level of planning policy and is a material consideration in planning decisions. The NPPF was originally introduced in March 2012 and was subsequently updated and published on 24 July 2018. The 2018 update broadly retains the wording of the 2012 Chapter on Conserving and Enhancing the Historic Environment (Chapter 16). The NPPF was updated again (February 2019) in order to provide definitions for housing need.

The most recent update was published in July 2021. This did not result in any changes to national policy that would impact this proposal, although paragraph numbers have been updated.

The NPPF represents a continuation of the philosophy contained within Planning Policy Statement 5 (PPS5), introduced in 2010 and one of a number of planning policy documents replaced by the NPPF in 2012.

The NPPF uses slightly different terminology to the Act and emphasises that authorities should take account of "the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation".

'Conservation' is defined within the NPPF as "the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance".

No definition of 'preservation' (or any variant) is contained within the document. However, Historic England advise that both 'conservation' and 'preservation' are concerned with the management of change which seeks to sustain the special interest or significance of heritage assets. 'Conservation' has the addition of taking opportunities to enhance significance where it is possible and considered to be appropriate. This is discussed in Historic England's 2018 publication *Decisions: Legal Requirements for Listed Building and Other Consents*.

The NPPF also helps to define other key terms within heritage policy. These are provided within the table below.

Term	Definition
Heritage Assets	"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)." (p.67)

Designated Heritage Assets	"A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation." (p.66)
Significance	"The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting." (p.71)
Setting of a Heritage Asset	"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral." (p.71)

Chapter 16 specifically relates to conserving and enhancing the historic environment (paras. 189-208).

Paragraph 194 stipulates that within applications, applicants are required to describe the significance of the heritage assets affected and the contribution made by their setting. Local authorities should also identify and assess the significance of the heritage assets affected by a proposal. This should be taken into account when assessing the impact of a proposal's heritage asset (Paragraph 195). Paragraph 197 of the NPPF goes on to state that when determining applications, local planning authorities should take account of:

- 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. (p.56)

Paragraphs 199-208 of the document discuss how potential impacts to heritage assets should be considered with paragraph 199 stipulating a requirement for great weight to be given to an asset's conservation when considering the impact of a proposed development on its significance. The weight given should reflect the importance of the asset (p.57-58).

NPPF Degrees of Harm

Where harm to the significance of a designated heritage asset is identified, the NPPF requires clear and convincing justification of the proposals. The document categorises levels of harm as: total loss; substantial harm; and less than substantial harm.

Paragraph 201 states that where a development would lead to substantial harm to (or total loss of) the significance of a designated asset, local planning authorities should refuse consent, unless it can be demonstrated that such harm is necessary to achieve substantial public benefits that outweigh that harm, 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.

Paragraph 202 states that where a proposed development will lead to less than substantial harm to the significance of a designated asset, this should be weighed against the public benefits of the proposal, including securing its optimum viable use.

In the case of impact on non-designated heritage assets, Paragraph 203 states that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

London Plan (2021)

Policy HC1 (Heritage Conservation and Growth) states that:

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.

D) Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

Camden Planning Policy

Local Plan (2017)

Policy D1 (Design) states that 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.

Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

As per national policy, 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 Area Statement: Primrose Hill (1985)

Camden Council's Primrose Hill Conservation Area Appraisal describes the townscape character of the area, describing the history and key features of the area and what makes it significant.

Planning Practice Guidance

The PPG offers guidance as to what public benefits may constitute and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits may include heritage benefits, such as:

- 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