

Camden Council, Planning - Development Control,
Camden Council,
Camden Town Hall,
London,
WC1H 8ND

Our ref: 2712-GM

30 January 2023

To whom it may concern,

45 Lancaster Grove, Belsize Park, London NW3 4HB

On behalf of our client, Gallery Interiors, please find enclosed our planning and heritage statement in relation to the planning application for the proposed works at 45 Lancaster Grove, London, NW3 4HB ("the Site").

The proposed description of development is:

"Removal of existing rear non-original sliding glazed doors and installation of glazed Crittall doors on non-original ground floor extension"

This application has been supported by the following documentation:

- Location Plan at a Scale of 1:1250
- Block Plan at a Scale of 1:500
- Planning Drawings prepared by Hubert Zandberg Interiors

The site is a ground floor flat within what would once have been a substantial and grand two-and-a-half storey detached dwelling, built in red brick with red tiled roof, and purportedly dating from the 1880s. The group of buildings of which the site forms part is described in the Belsize Conservation Area Statement (CAS) as being characterised by common decorative brickwork of differing designs.

The proposal relates to removing the existing doors found in the extension which was granted planning permission by the London Borough of Camden in 2020 under planning permission reference 2020/2126/P.

Under s70(2) of the Town and Country Planning Act 1990 and s38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with



the relevant policies in the development plan for the area, unless other material considerations indicate otherwise.

The Government's planning policies, as set out in the National Planning Policy Framework (NPPF) published in 2021, are a significant material consideration. Further guidance on the interpretation of the Framework's policies is provided by the Planning Practice Guidance (PPG).

Consideration of national policy and guidance set out in the NPPF (2021) and NPPG alongside the legal tests of The Planning (Listed Buildings and Conservation Area) Act 1990, Sections 66(1) and 72(1).

The London Borough of Camden's development plan consists of the following documents:

- The London Plan (2021)
- Camden Local Plan (2017)
- Camden Planning Policy Map (2017)

Assessment

The heritage policy and guidance include the statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990 which requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area, in determining applications.

In accordance with the requirements of the NPPF the significance of the heritage assets of the conservation area and the buildings, which will be affected by any proposal. Consequently, the proposals have been informed by a clear understanding and appreciation of the historical development and architectural character of the Site and its surroundings, as found today.

Paragraph 130 of the NPPF 2021 sets out some key requirements that decisions should take into account. The essential change in point c of paragraph 130 which states: "decisions should ensure that developments.... are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change."

Paragraph 194 of the NPPF sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Importantly, Annex 2 of the NPPF defines "conservation" as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. It is not a process that should prevent change where proposals, such as these, would not result in harm to the significance of the heritage assets but have the potential to deliver enhancements.



In assessing the impact of the proposals on the heritage asset, in this case the Belsize Park Conservation Area, we are required to assess whether the proposals would impact the significance of the heritage asset. There is a strong presumption against the grant of permission for development that would harm (i.e., not preserve) the significance of the Conservation Area, though this presumption would be lessened if the harm can be minimised or mitigated.

For these purposes “preserve” means to do no harm, as is established in case law. “Harm” is defined by Historic England as change which erodes the significance of a heritage asset. This position is also in line with the policy requirements set out in Local Plan Policy CL3 (Heritage Assets- Conservation Areas and Historic Spaces).

London Plan Policy HC1 (Heritage conservation and growth) states that development should conserve the heritage asset and its significance by being sympathetic to their form, scale, materials, and architectural detail.

London Plan policy D3 states that Development should respond to the character of a place, be of high-quality design and protect the special features of the locality.

Camden Local Plan Policy D2 (Heritage) states:

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:

- require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

Planning and Heritage Assessment

‘Significance’ lies at the core of these principles, the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. The document sets out how heritage values can be grouped into four categories:

- “Evidential value: the potential of a place to yield evidence about past human activity
- Historic value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory”.

It states that:

“New work or alteration to a significant place should normally be acceptable if:



- a. There is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;
- c. the proposals aspire to a quality of design and execution which may be valued now and in the future;
- d; the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (Page 58)”.

The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the “aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups” (Page 2, Article 1.2).

It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 189 of NPPF.

The Historic England document ‘Conservation Principles’ states that “understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment.”

The existing windows found on the recent rear extension though of high quality and finish are not considered to contribute to the significance of the designated heritage asset by way of its historic value. Though the property and the rear of the property are considered to contribute positively to the designated heritage asset, the removal of the modern glazing from the modern extension is not considered to harm the historic significance of the Conservation Area.

The proposals include the installation of Crittall Windows is considered to have a neutral impact on the significance of the Conservation Area.

The proposals will replace existing modern windows and replace them with higher quality materials.

When reviewing aerial imagery of neighbouring properties, it is clear that there is a range of materials used on non-original extensions when it comes to French doors and other glazed doors. The inclusion of a high quality Crittall Design is not considered to harm the historic significance of the conservation area and would preserve the character of the existing extension and therefore the Belsize Conservation Area. The proposals will be the same size as the existing glazed doors, so there will be no impact on the character of the extension or any demolition to the extension.



It is a minor addition and not impact the heritage significance of the conservation area due to the existing side entrance gate and fence located to the front of the property. It is therefore considered to comply with London Plan Policy CL1 and Camden Local Plan Policy D2.

Conclusions

We believe that the above clearly shows that the principle of a development of this nature is acceptable in this location. The Proposed Development is a well-considered scheme respecting the identified value of the heritage assets.

For these reasons, the Proposed Development is a sustainable form of development that will accord with legislation governing the Conservation Area and the Development Plan resulting in a proposal that should be acceptable to the London Borough of Camden.

Accordingly, we respectfully request that this application for planning permission is determined without delay, in line with the prescribed timescales (eight weeks).

Should you wish to discuss this further please do not hesitate to get in contact with me on my contact details below.

Yours sincerely

BELL CORNWELL LLP

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