

November 2021



HERITAGE STATEMENT

26 LOWER BELGRAVE STREET

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1.0 Introduction

- 1.1 This Heritage Statement has been prepared to support an application for minor alterations to 26 Lower Belgrave Street, henceforth referred to as the site. The site forms part of a Grade II listed terrace, within the Belgravia Conservation Area. Both the building and Conservation Area are designated heritage assets.

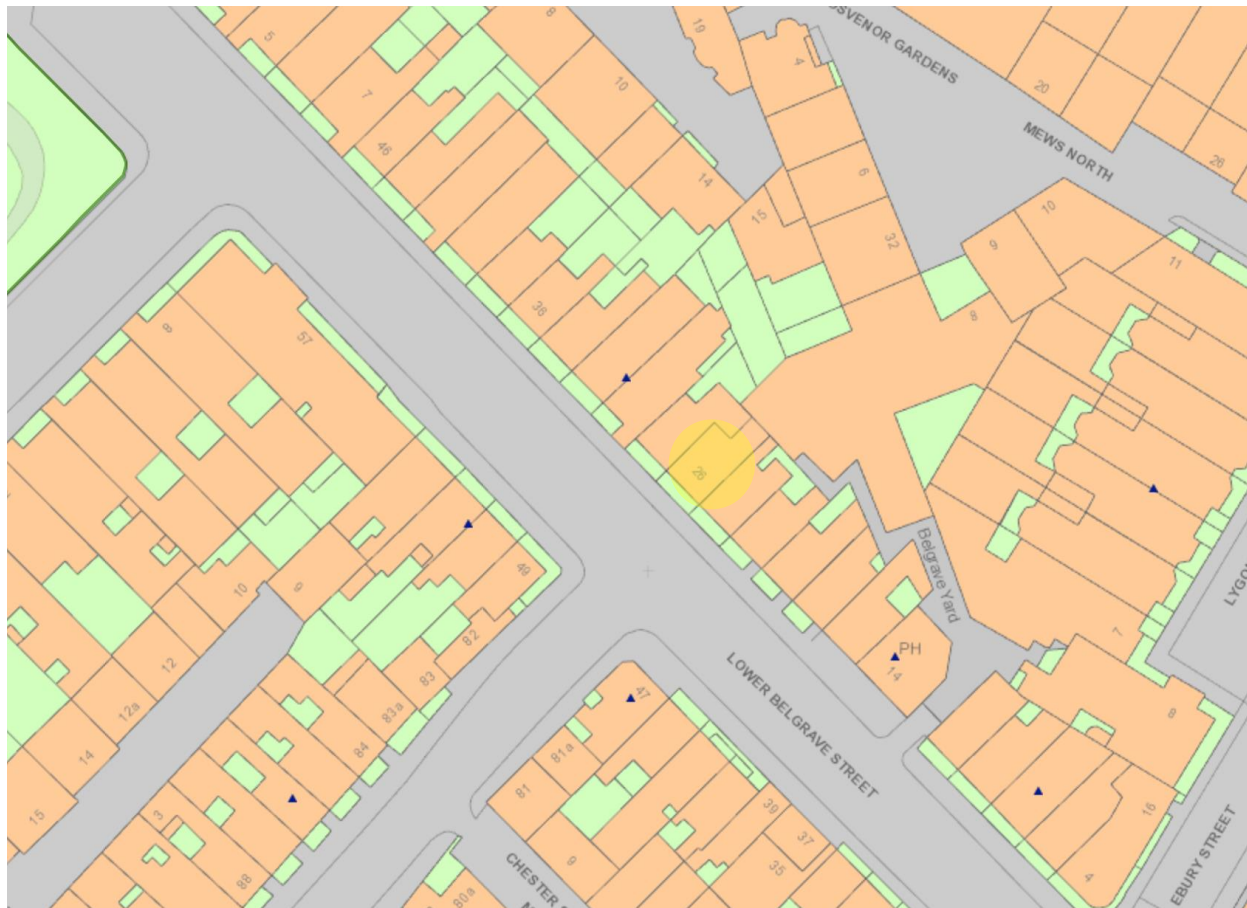


Figure 1 Site location (yellow transparency). Source: Historic England.

- 1.2 This Heritage Statement includes an assessment of significance and an assessment of the impact of the proposed development on the significance of the identified assets. This approach to impact-assessment is required in order to satisfy the provisions of Section 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF 2021) where the assessment of heritage assets or their setting is being considered.

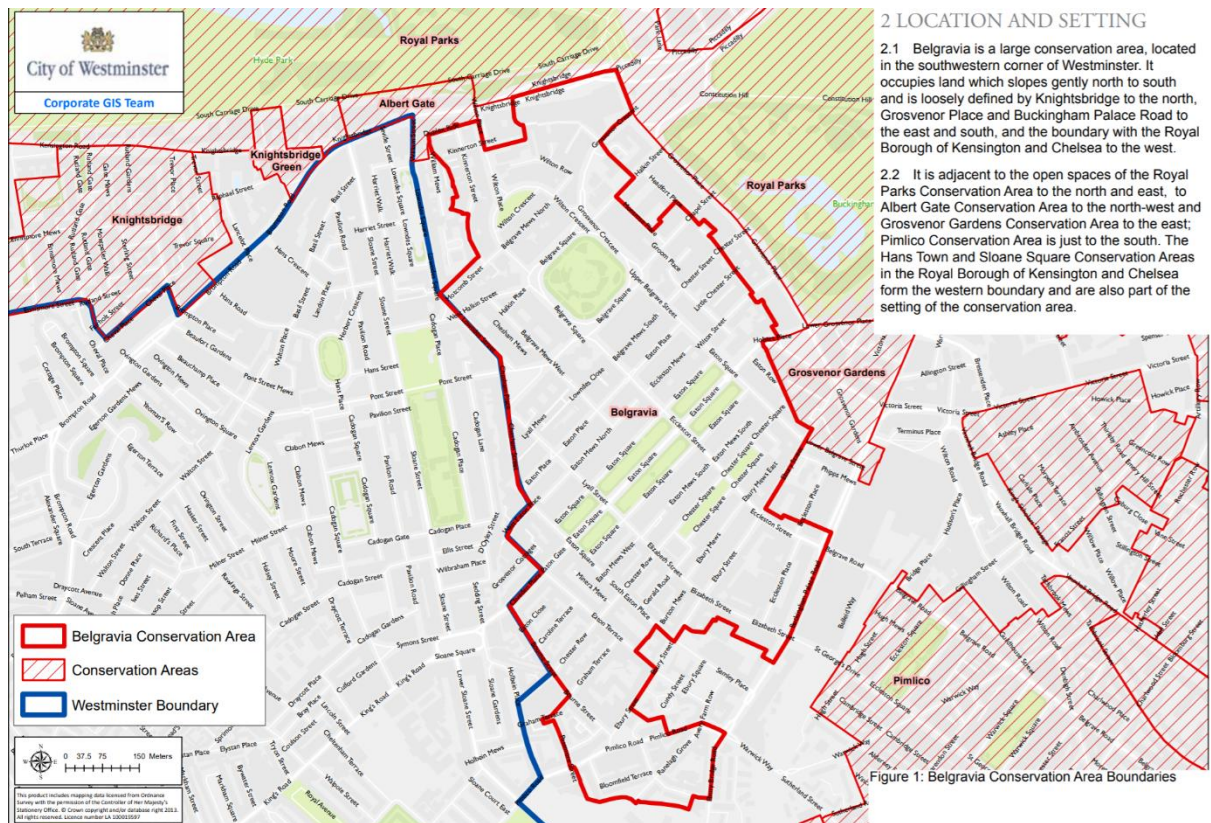


Figure 2. Belgravia Conservation Area Map. Source: Westminster Council.

2.0 Heritage Policy and Guidance Summary

Legislation

Planning (Listed Buildings & Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 16(2) states *“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”*.
 - Section 66(1) reads: *“In considering whether to grant planning 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”*.
 - In relation to development within Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

National Planning Policy Framework (2021)

- 2.2 The revised National Planning Policy Framework (NPPF) was published on 20th July 2021, replacing the previous published 2019 and 2012 frameworks.
- 2.3 With regard to the historic environment the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”* The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.4 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a *“manner appropriate to their significance”* (Paragraph 189).
- 2.5 NPPF directs local planning authorities to require an applicant to *“describe the significance of any heritage assets affected, including any contribution made by their setting”* and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 194).
- 2.6 Paragraph 195 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, *“to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.



- 2.7 An addition to the 2021 NPPF is outlined in paragraph 198. This states that local planning authorities should have regard to the importance of the retention 'in-situ' of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.
- 2.8 Paragraph 199 requires 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*
- 2.9 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, *"clear and convincing justification"* (Paragraph 200). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to 'wholly exceptional' for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.
- 2.10 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 states the following:
- "Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or 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."*
- 2.11 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in *"less than substantial harm"*, paragraph 202 provides the following:
- "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."*
- 2.12 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.
- 2.13 In the case of non-designated heritage assets, Paragraph 203 requires a Local Planning Authority to make a *"balanced judgement"* having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.14 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

- 2.15 With regards to conservation areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. While it is noted that not all elements of a conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*
- 2.16 Broader design guidance is given in Chapter 12, ‘Achieving well-designed places’. The 2021 NPPF introduces the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect ‘local character’ in order to create ‘beautiful and distinctive places’ (paragraph 127).
- 2.17 Paragraph 134 states that significant weight should be given to development which reflects local design polices, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the ‘standard of design’ providing they conform to the ‘overall form and layout of their surroundings’.

Planning Practice Guidance (PPG) (2019)

- 2.18 The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.
- 2.19 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.

Historic England ‘Conservation Principles: Policies and Guidance’ 2008



- 2.20 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment, including changes affecting significant places. The guide sets out six high-level principles:
- *“The historic environment is a shared resource*
 - *Everyone should be able to participate in sustaining the historic environment*
 - *Understanding the significance of places is vital*
 - *Significant places should be managed to sustain their values*
 - *Decisions about change must be reasonable, transparent and consistent*
 - *Documenting and learning from decisions is essential”*
- 2.21 ‘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”.

2.22 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)”.*

Historic England Advice Note 2 ‘Making Changes to Heritage Assets’ (February 2016)

2.23 This document provides advice in relation to aspects of addition and alteration to heritage assets:

“The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting” (paragraph 41).

Historic England: Historic Environment Good Practice Advice (GPA) in Planning Note 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ (March 2015)

2.24 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the NPPF (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness” (para 1).*

2.25 Paragraph 52 discusses ‘Opportunities to enhance assets, their settings and local distinctiveness’ that encourages development: *“Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation”.*

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

- 2.26 This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities' decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.
- 2.27 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Regional Policy

The London Plan (2021)

- 2.28 The London The New London Plan was adopted in March 2021, the following policies are relevant to heritage and this application.
- 2.29 Policy D1 London's form and characteristics
- A. *Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:*
- Form and layout
- 1) *use land efficiently by optimising density, connectivity and land use patterns*
 - 2) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*
- Quality and character
- 12) *respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local character*
 - 13) *be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.*
- 2.30 Policy HC1 Heritage conservation and growth
- A. *Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*
- B. *Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*

- 1) *setting out a clear vision that recognises and embeds the role of heritage in place-making*
- 2) *utilising the heritage significance of a site or area in the planning and design process*
- 3) *integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
- 4) *delivering positive benefits that sustain conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

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 seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Policy

Westminster City Plan (2021)

38. Design Principles

A. New development will incorporate exemplary standards of high quality, sustainable and inclusive urban design and architecture befitting Westminster's world-class status, environment and heritage and its diverse range of locally distinctive neighbourhoods.

Responding to Westminster's Context

B. All development will positively contribute to Westminster's townscape and streetscape, having regard to:

- 1. the character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them and the pattern and grain of existing streets, squares, mews and passageways;*
- 2. materials, building lines, scale, orientation, access, definition, surface treatment, height and massing;*
- 3. the form, character and ecological value of parks, gardens and other open spaces;*
- 4. Westminster's waterways and waterbodies; and*
- 5. the preservation and enhancement of the surrounding tree population.*

People Centred Design

C. All development will place people at the heart of design, creating inclusive and accessible spaces and places, introducing measures that reduce the opportunity for crime and anti-social behaviour, promoting health, well-being and active lifestyles through design and ensuring a good standard of amenity for new and existing occupiers.

Sustainable Design

D. Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design, including:

1. use of high-quality durable materials and detail;
2. providing flexible, high quality floorspace;
3. optimising resource and water efficiency;
4. enabling the incorporation of, or connection to, future services or facilities; and
5. minimising the need for plant and machinery.

E. Applicants will demonstrate how sustainable design principles and measures have been incorporated into designs, utilising environmental performance standards as follows:

1. Non-domestic developments of 500 sq m of floorspace (GIA) or above will achieve at least BREEAM "Excellent" or equivalent standard.
2. Residential conversions and extensions of 500 sq m (GIA) of residential floorspace or above, or five or more dwellings will aim to achieve "Excellent" in BREEAM domestic refurbishment or equivalent standard.

Promoting Excellence in Contemporary Design

F. Imaginative approaches to contemporary architecture and use of innovative modern building techniques and materials will be encouraged where they result in exemplary new buildings and public realm which incorporate the highest standards of environmental sustainability, that respect and enhance their surroundings and are integrated with and better reveal Westminster's heritage and existing townscape.

39. Westminster's heritage

A. Westminster's unique historic environment will be valued and celebrated for its contribution to the quality of life and character of the city. Public enjoyment of, access to and awareness of the city's heritage will be promoted.

B. Development must optimise the positive role of the historic environment in Westminster's townscape, economy and sustainability, and will:

1. ensure heritage assets and their settings are conserved and enhanced, in a manner appropriate to their significance;
2. secure the conservation and continued beneficial use of heritage assets through their retention and sensitive adaptation which will avoid harm to their significance, while allowing them to meet changing needs and mitigate and adapt to climate change;
3. place heritage at the heart of place making and good growth, maintaining the unique character of our heritage assets and delivering high quality new buildings and spaces which enhance their settings

Listed Buildings

- C. Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric.
- D. Changes of use to listed buildings will be consistent with their long-term conservation and help to restore, retain and maintain buildings, particularly those which have been identified as at risk.

- E. Development within the settings or affecting views of listed buildings will take opportunities to enhance or better reveal their significance.
- F. Demolition of listed buildings will be regarded as substantial harm and will be resisted in all but exceptional circumstances.

Conservation Areas

- G. Development will preserve or enhance the character and appearance of Westminster's conservation areas. Features that contribute positively to the significance of conservation areas and their settings will be conserved and opportunities taken to enhance conservation areas and their settings, wherever possible.
- H. There will be a presumption that unlisted buildings that make a positive contribution to a conservation area will be conserved, unless it has been demonstrated that the relevant tests in national policy have been met. Buildings which make a negative or neutral contribution may be replaced or refurbished where this will result in a high quality building which will improve their appearance in the context of the conservation area and their environmental performance.
- M. The contribution of existing uses to the character, function and appearance of conservation areas will be considered and changes of use supported where they make a positive contribution to conservation areas and their settings.

Registered Historic Parks and Gardens

- I. Proposals affecting Westminster's registered historic parks, gardens and open spaces will safeguard their special historic interest, integrity, character and appearance, and protect their settings and significant views from and towards these spaces.

Non-designation Heritage Assets

R. Non-designated heritage assets (including local buildings of merit, archaeology and open spaces of interest within and outside conservation areas) will be conserved. When assessing proposals affecting non-designated heritage assets, a balanced judgement will be made regarding the scale of any harm or loss of the asset and the benefit of the proposed development.

40. Townscape and architecture

- A. Development will be sensitively designed, having regard to the prevailing scale, heights, character, building lines and plot widths, materials, architectural quality and degree of uniformity in the surrounding townscape.
- B. Spaces and features that form an important element in Westminster's local townscapes or contribute to the significance of a heritage asset will be conserved, enhanced and sensitively integrated within new development, including important architectural details, boundary walls

and railings, historic roof forms or structures, open lightwells, historic or characteristic shopfronts and street furniture, as well as squares, parks and gardens. Where possible, lost or damaged features will be reinstated or restored.

Extensive Development

- C. Extensive development will maximise opportunities to enhance the character, quality and functionality of the site and its surroundings, including creating new compositions and points of interest, and high-quality new streets and spaces, linked to the surrounding townscape to maximise accessibility.

Alteration and Extensions

- D. Alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings and spaces that contribute positively to Westminster's distinctive townscape.

Roof Extensions

- E. Roof extensions will be supported in principle where they do not impact adversely on heritage assets and should:

1. where part of a terrace or group already characterised by roof additions or alterations, be of appropriate design which follows an established form and would help to unify the architectural character of the existing terrace or a group;
2. where part of a terrace with an existing roof line unimpaired by roof extensions, take a coordinated approach, adding roof extensions of consistent and appropriate design to each property across the terrace;
3. in other locations, be of appropriate design sympathetic to the architectural character of the existing building.

Westminster Views

- F. New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible.

Additional Relevant Policy Documents Include:

Belgravia Conservation Area Audit (2013)

This document defines the character and apperance of the conservation area and provides further guidance on development.

3.0 Methodology

Heritage Assets

- 3.1 A heritage asset is defined within the National Planning Policy Framework as “*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)*” (NPPF Annex 2: Glossary).
- 3.2 To be considered a heritage asset “*an asset must have some meaningful archaeological, architectural, artistic, historical, social or other heritage interest that gives it value to society that transcends its functional utility. Therein lies the fundamental difference between heritage assets and ordinary assets; they stand apart from ordinary assets because of their significance – the summation of all aspects of their heritage interest.*” (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)
- 3.3 ‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.
- 3.4 The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that “*non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*” (Paragraph: 039 Reference ID: 18a-039-20190723)
- 3.5 The PPG goes on to clarify that “*a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.*”

Meaning of Significance

- 3.6 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)
- 3.7 The NPPF (Annex 2: Glossary) also defines significance as “*the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.*”
- 3.8 Significance can therefore be considered to be formed by “*the collection of values associated with a heritage asset.*” (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)

Assessment of Significance/Value

- 3.9 It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in the NPPF.
- 3.10 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.*"
- 3.11 The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.
- Understanding the fabric and evolution of the asset;
 - Identify who values the asset, and why they do so;
 - Relate identified heritage values to the fabric of the asset;
 - Consider the relative importance of those identified values;
 - Consider the contribution of associated objects and collections;
 - Consider the contribution made by setting and context;
 - Compare the place with other assets sharing similar values;
 - Articulate the significance of the asset.
- 3.12 At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset's significance. Historic England's 'Conservation Principles' sets out a grouping of values as follows:

Evidential value – '*derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.*' (Page 28)

Aesthetic Value – '*Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive*'. (Pages 30-31)

Historic Value – '*derives from 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... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value*'. (Pages 28-30)

Communal Value – "*Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal*

significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there". (Pages 31-32)

- 3.13 Value-based assessment should be flexible in its application, it is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of Setting/context to Significance

- 3.14 In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.
- 3.15 Historic England's Conservation Principles defines *setting* as "*an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.*"
- 3.16 It goes on to state that "*context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places*" (page 39).
- 3.17 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.18 The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

- 3.19 It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.
- 3.20 There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established 'James Semple Kerr method' which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and*

Bridges (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This 'value hierarchy' has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.

- 3.21 The first stage of our approach is to carry out a thoroughly researched assessment of the significance of the heritage asset, in order to understand its value:

Table 1: Significance of Heritage Assets

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

- 3.22 Once the value/ significance of an asset has been assessed, the next stage is to determine the assets 'sensitivity to change'. The following table sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.
- 3.23 An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).
- 3.24 Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

Table 2: Explanation of sensitivity

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

- 3.25 Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

Table 3: Magnitude of Impact

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	<u>Adverse</u> : Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction. <u>Beneficial</u> : The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.
High	<u>Adverse</u> : Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.

	Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.
Medium	<p>Adverse: Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p>Beneficial: Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
Minor/Low	<p>Adverse: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p>Beneficial: Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
Negligible	Barely discernible effect on baseline conditions but a slight adverse or beneficial impact.
Neutral	A change or effect which is neither adverse nor beneficial in impact.
Nil	No change in baseline conditions.

Summary

- 3.26 The aim of this document is to identify and assess any likely impacts that the proposed development may cause to the value or significance of the identified heritage assets and/or their settings.
- 3.27 Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is *“proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”* as set out in Paragraph 194 of the National Planning Policy Framework.

4.0 Historic Development Overview

- 4.1 The development of Belgravia primarily occurred during the nineteenth century and is closely associated with the developer Thomas Cubitt. In agreement with the Grosvenor Estate, Cubitt created a distinctive style which still characterises the area, comprising lengthy stucco rendered terrace rows, forming a clear geometric layout and hierarchy to the street scape.



6.1 Figure 3. OS Map 1850. The location of the site is indicated in red.



Figure 4. 1865 Map of Cubitt's development in Belgravia. The location of the site is highlighted in yellow.

- 4.2 26 Lower Belgrave Street conforms to this style, reflecting a typical Regency Style townhouse, and is characteristic of Cubitt's development. It is thought to date to between 1827 and 1850. The 1st edition OS map of 1850 showing the house and wider terrace to be complete.
- 4.3 At this time the terrace already possesses a high degree of variation to the rear. The site and neighbouring two properties to the south show a small closet wing intact, appearing to connect directly with a secondary block, presumably mews houses or stabling. The rear façade of the site appears slightly set inwards from the neighbouring property to the north. The rest of the terrace has a variety of massing in terms of rear projections, with some of the rear gardens entirely infilled.

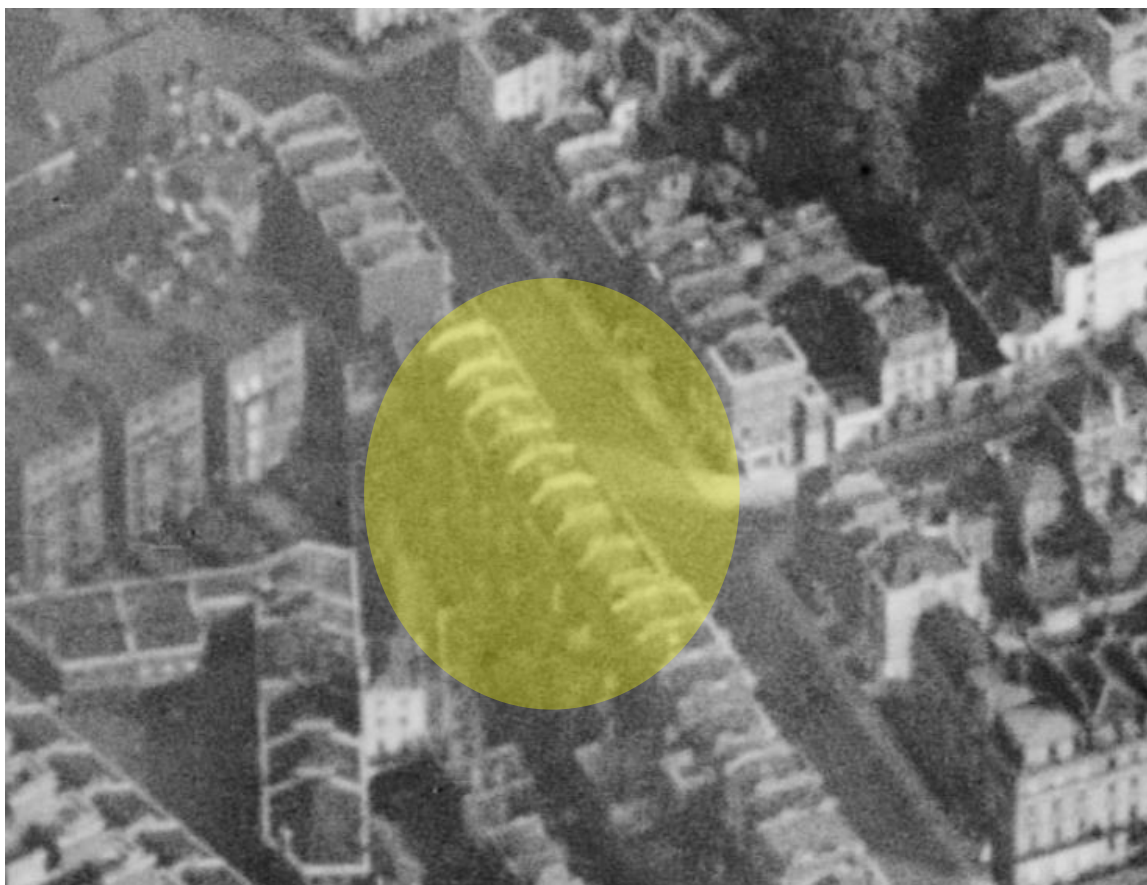


Figure 5. Aerial view looking south east towards the rear of the site, 1928. Source: Britain From Above.



Figure 6. OS Map 1964.

- 4.4 By 1964, the stabling to the rear of the terrace has been redeveloped. Similarly, the flanking properties either side appear to have had their closet wings redeveloped. Additionally, a line is shown in this map parallel to the rear façade of the property. This suggests either a further extension by this date or a step. Note the extreme variety in massing to the rear of the terrace.
- 4.5 The terrace of 16-46 Lower Belgrave Street was subsequently listed in December 1987. Following on from the designation of the property an extension to the rear was granted consent (88/02061/LBC). The works were described as:

- 4.6 'Alterations including construction of infill conservatory at rear basement level, rebuilding of first floor rear extension and erection of a second floor extension on top with roof terrace above....'

5.0 Assessment of Heritage Assets

- 5.1 This section will assess the significance of the assets impacted by the proposals, and comment on the existing contribution of the site.

16-40 Lower Belgrave Street

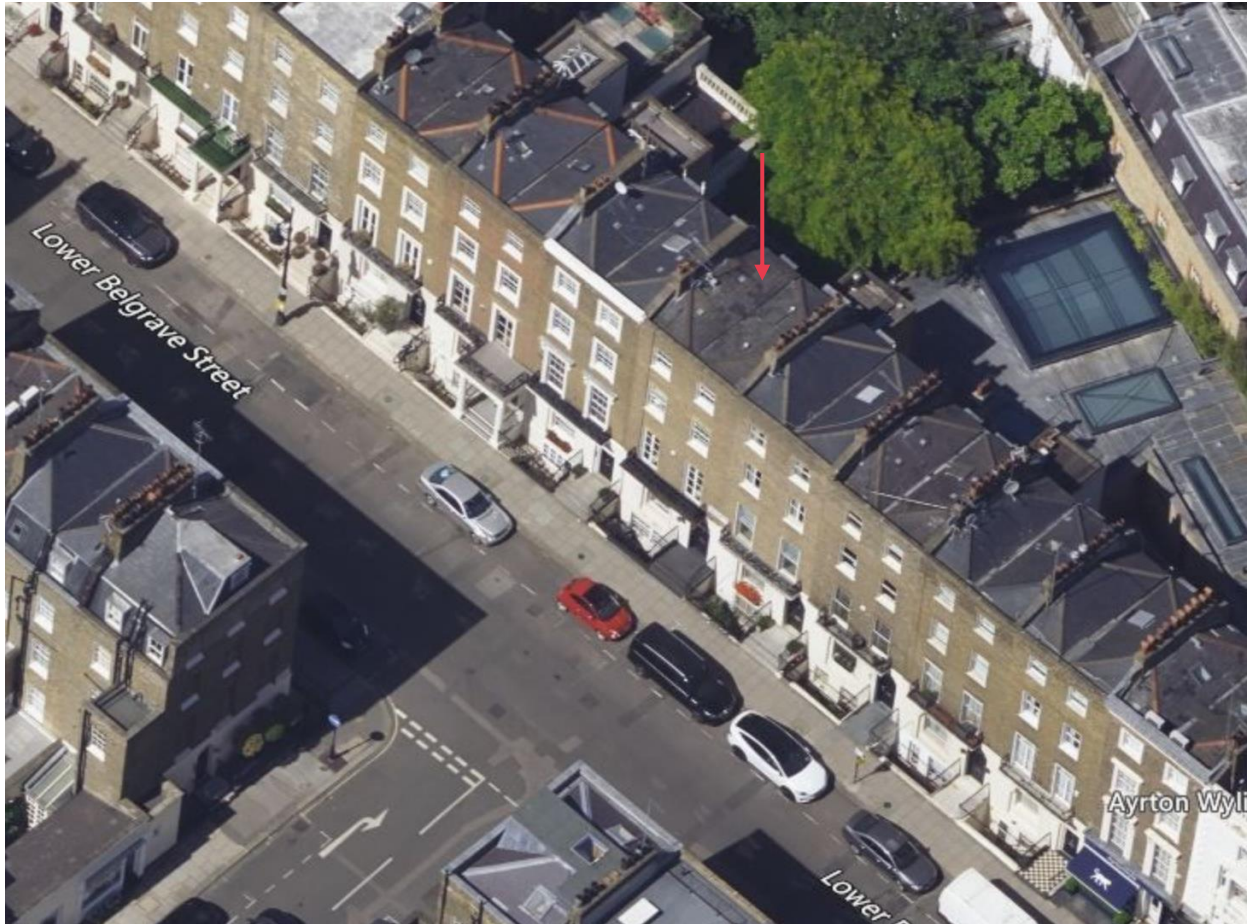


Figure 7. 26 Lower Belgrave Street (red arrow), principal elevation.



Figure 8. Lower Belgrave Street. Rear elevation, proposed location of air conditioning unit shown by red arrow. Notice other air conditioning units highlighted by green

arrows

- 5.2 The terrace comprises an early nineteenth century four storey row of houses. The main façade is of brick, with channelled stucco to the ground floor and plain stock brick above. Projecting Doric porches and iron balconies are seen throughout. While remains of the stucco architrave are visible, these appear to be missing from many of the houses. Beyond the use of stucco render, the ground floor is further ennobled by arched entrances and ground floor windows. Fenestration appears to have been sporadically replaced across the length of the terrace.
- 5.3 To the rear whilst closet wing additions are visible, these have undergone a wide variety of alterations, resulting in a changing massing, volume and material character to the rear of the terrace. First floor as well as ground floor infill extensions are visible. Figure 8 clearly shows that air conditioning units are a common feature in the conservation area. Figure 10 also clearly shows that there were previously air conditioning units on the roof.
- 5.4 The significance of the listed terrace therefore resides in its unified appearance from the west and decorative main façade. A sense of consistency is reflective of the wider development of the area by Cubitt, reflecting the historic development in this location within the nineteenth century, with a distinctive formal terrace style. It is noted that the terrace as a whole is listed rather than

any one individual property. There is therefore moderate historic and architectural interest, along side associative interest with Cubitt himself. This results in an overall **moderate** significance, and **moderate** sensitivity.



Figure 9. Rear terrace at third floor.

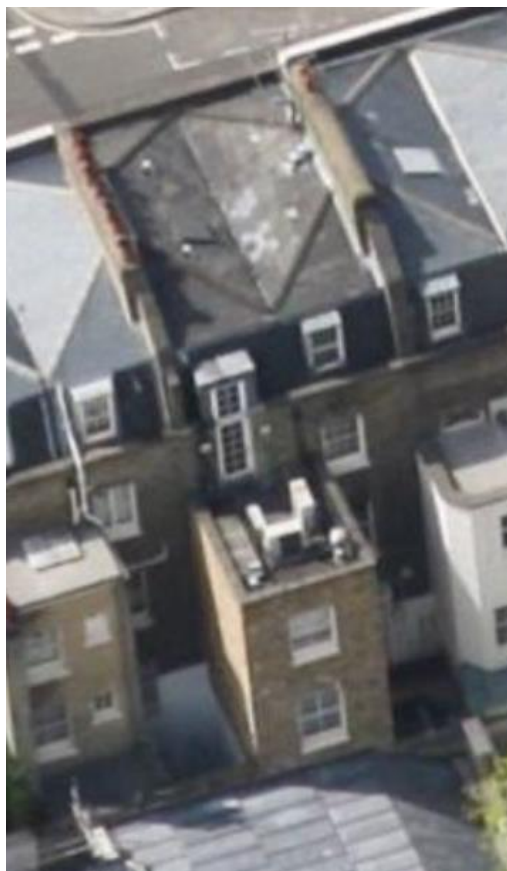


Figure 10 Aerial map showing air conditioning units previously located on the roof (Bing maps).



Figure 11. View from terrace at third floor, note views of air conditioning units seen in the surroundings.

Contribution of the Site

- 5.5 The main façade has retained a consistent historic appearance, the ground floor is picked out in rusticated stucco, with exposed brick above. At first floor a balcony appears to have retained its iron railing however there is a degree of variety across the terrace suggesting piecemeal replacement. The site's external appearance is characteristic of the period, and as such main façade is considered to contribute to the historic and architectural interest of the listed terrace as a whole. Internally the site has retained a balanced plan form, with a double width room facing the street, to first, second and third floors with smaller rooms adjacent to the stair and rear. This is a typical layout for a building of this period and contributes to the overall architectural and historic interest of the terrace. Recent consented works include the redecoration to the majority of the interior, retaining reproduction decorative cornices at ground floor. The ceilings are of

modern plasterboard and cornice detailing is also considered to be modern replicas. At the time of the site visit these works were being implemented. The sensitivity of the internal spaces is reduced given these later works, however the plan form and remaining historic as well as reproduction decorative detail is reflected of the special interest of the site as part of a nineteenth century terrace.

- 5.6 The rear façade includes the later two storey flat roofed extension, constructed in the twentieth century. The height of this extension matches the neighbouring property which also includes two air-conditioning units to the rear. As a rear elevation the contribution of this façade to the overall architectural interest of the building is somewhat reduced. Combined with the waves of alteration to this façade, which includes a series of rear extension this area is also considered to have a reduced sensitivity.
- 5.7 The significance of the site and contribution to the wider terrace is therefore considered to reside in the retained balanced plan form, main façade and remaining original decorative detail. The decorative detail to the interior and rear façade possess a reduced sensitivity given the waves of alteration including the consented works which are currently being implemented. These changes include a proliferation of air conditioning units to the roofs of the closet wings.

Belgravia Conservation Area

- 5.8 The Belgravia Conservation Area was originally designated in 1968 and extended in 1990 to include an area between Ebury Street and Buckingham Palace Road. The Belgravia Conservation Area Information leaflet was initially published by Westminster City Council in May 2004.
- 5.9 Belgravia was largely laid out in the 1820s by Thomas Cubitt and Thomas Cundy on land owned by the Grosvenor Estate. The area is characterised by its uniformity and formal layout comprising of grand long stuccoed 19th century terraces of uniform mass, height and classical architectural treatment with a variety of detailing. Streets are wide and there are large garden squares. Secondary streets have brick facades with stucco at ground floor. The area is still predominantly residential with a significant number of embassies around Belgrave Square, and some small commercial pockets on the edges.
- 5.10 Lower Belgrave Street is recognised as a primary street within the Audit. It is a wide road that links the principal squares within the surroundings. The street is lined with opulent brick and stucco terraces, in late Georgian/Regency classical style that follows the typical second rate housing form made common by Cubitt's much copied development plans.
- 5.11 As a result of the good-quality stock of buildings and townscape value, the significance of the Belgravia Conservation Area is considered to be **good**.

The contribution of the Site

- 5.12 The site presently makes a positive contribution to the conservation area, primarily as a result of the group value of the terrace when perceived as a whole. Due to the later alterations to the rear, the rear elevation is of less interest. The overall contribution of the site is therefore **positive**.

6.0 Proposals

- 6.1 The section will determine the impact of the proposals upon the significance of the listed building and conservation area and should be read in conjunction with the full drawing pack. The current scheme seeks the installation of air conditioning to the ground floor dining room, 1st floor living room and third floor bedroom. This includes the installation of a Dakin Mini VRV air conditioning system to each room and a condensing unit to the second-floor closet wing roof.
- 6.2 Internally the works comprise the installation of a purpose made cabinet located within the ground floor dining room and an adapted existing radiator cabinet to the first floor living room. An existing riser is used to provide connecting these units to the third floor.
- 6.3 At third floor the fan unit would be housed within the ceiling void above the lobby, connected to a linear grille discretely located at high level between built in wardrobes. The cabinets will be designed to be appropriately detailed and no more intrusive than standard interior fittings such as radiators.
- 6.4 These units would use existing floor voids connecting to a new riser located within the stairwell at third floor. The proposed condenser unit is to be located at the roof of the third floor modern extension and screened via the permitted railings to the terrace at this level.

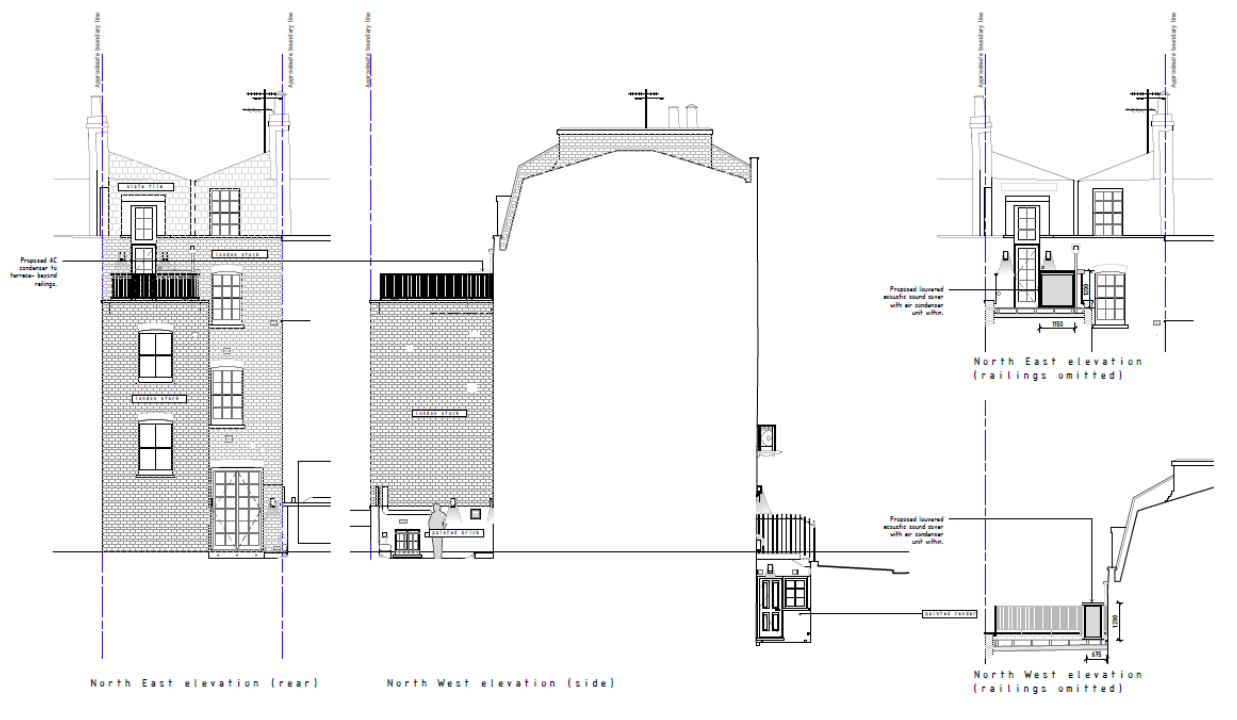


Figure 12. Proposed elevation and section.

Impact to the listed building

- 6.5 The proposed air conditioning works are considered to be sensitively designed and discretely located, utilising existing voids where possible. The works themselves are not considered to harm any historic fabric of interest aside from the loss of a small amount of brickwork where the condenser units connects through to the riser, and where small openings are proposed within the modern skirtings and joinery. The units to each room are removable and housed within cabinetry and will leave the appreciation of the interior room volumes intact as existing. As noted above,

the internal decorative appearance reflects the recently consented works to the interior of the site and the introduction of modern but appropriately detailed cabinetry and a riser is considered to have a neutral impact on the existing internal character.

- 6.6 The second-floor rear extension is a modern addition, added in the twentieth century. The addition of a condenser unit is not considered to harm any fabric of interest and will be screened from the surroundings by the permitted railings and set back from the parapet edge, further reducing views towards the units. The unit is also more discreet than the units shown in figure 10.
- 6.7 The overall impact to the listed building is therefore considered to be reversible and **neutral**.

Impact to the conservation area.

- 6.8 It is noted that surrounding views to the rear elevation of the terrace, also take in neighbouring buildings with condenser units visible to the adjacent property. The proposals are therefore considered to be appropriate and will have no impact upon the existing contribution of the site to the character and appearance of the conservation area, having a **neutral** impact upon its significance.

7.0 Conclusion

- 7.1 This report considers the impact of the proposals on the significance of the heritage assets identified, including the contribution made by their settings. This approach to impact-assessment is required in order to satisfy the provisions of Sections 16, 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 in relation to listed buildings and the National Planning Policy Framework (NPPF) where the impact of development on heritage assets or their settings is being considered.
- 7.2 As a result of our assessments on Site, it is considered that the emerging proposals would result in **neutral** impact to the listed building.
- 7.3 As such, the proposed works are considered to have had special regard for the desirability of preserving the special interest of the listed building and its setting in accordance with Sections, 16, 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990. The proposals have also been found to have a neutral impact upon the character and appearance of the conservation area, in accordance with section 72.
- 7.4 With reference to the Westminster City Plan (2021), the proposals have been shown to have regard to the existing character of the surroundings and heritage assets, in compliance with policy 38. Design Principles. The proposals encompass the sensitive adaptation of the listed building, preserving decorative detail of interest and conserving the significance and setting of the heritage assets identified in compliance with policy 39.
- 7.5 Therefore, the proposals are also considered to comply with NPPF paragraphs 189-206, and the local planning policies.

APPENDIX A

STATUTORY LIST DESCRIPTION



16-46 Lower Belgrave Street

Grade: II

List Entry Number: 1274657

Date first listed: 01-Dec-1987

Row of houses. Early C19. Brick. Channelled stucco to ground floor. Roofs not visible. 4 storeys and basement, No 44 of 5 storeys, 2 windows wide. Arched entrances and ground floor windows. Fanlights. Projecting Doric porches to Nos 30 to 42 (No 16 with shop to ground floor). First floor iron balconies (probably C20 to Nos 34 to 44); square gauged headed windows, sashed, some glazing bars. French casements to first floor. Nos 16, 28 and 30 with some stucco architraves. Iron area railings.

