

HANDFORTH HERITAGE

14 Eaton Place, Westminster
Heritage Impact Assessment

April 2022



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1. Introduction

This Heritage Assessment ('report') has been produced by Handforth Heritage to accompany a full-application submission relating to the proposed two storey, half width rear extension to the grade II* listed No. 14 Eaton Place ('the site'), which is located within the Belgravia Conservation Area. The report has been produced to identify and assess the significance of any Heritage Assets that may be potentially affected by the proposals.

This report has been undertaken in accordance with Historic England's guidance on heritage assessments, namely *Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12* and *Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (GPA 3)*. The legislation and policy framework applicable to this application is set out at Appendix 1.

The report includes an impact assessment assessing the potential impact the scheme will have upon the identified Heritage Assets, namely the listed building and the wider conservation area.



Figure 1 Site location plan, showing the site in red.

2. Historic Development

In the 18th century Belgravia was a wasteland used for grazing sheep. Horwood's 1799 map provides an insight into the appearance of the time, with open fields dominating the area. The turning point for the area came in the early 19th century when George IV decided to build a new palace on the site of Buckingham House in 1819. In the 1820s, Lord Grosvenor decided to develop the area as an estate to rival his existing estate in Mayfair. He came to an agreement with Thomas and Lewis Cubitt, and over the next 30 years Belgravia was constructed. The estate was named Belgravia after Belgrave, a village on the Grosvenor family estate in Leicestershire.

Pevnsner wrote in his Buildings of England, London 1- Belgravia:

Belgravia was the crowning achievement of Thomas Cubitt, the builder and contractor who had already developed estates in North London and in Bloomsbury. While things went on in Bloomsbury, Cubitt got interested in the land west of the gardens of Buckingham Palace which in 1821 had become the residence of the King. The land belonged to Lord Grosvenor and was fields except for a strip off Grosvenor Place. It obviously had capabilities, but it was marshy in parts. In 1825 Cubitt had begun work on the St Katherine's Dock east of the Tower, and he had the ingenious idea of using the earth excavated there to raise the ground in what was to become known as Belgravia... Architecturally Belgravia carries on immediately from Nash and his most recent work on the Regent's Park terraces. Cubitt (who, however, built more soundly than Nash's contractors) uses the same principle of the very long unified front, stuccoed all over, and given rhythm and dignity by central and angle accents.

Eaton Place reflects the architectural language of typical Regency styled townhouses, and is characteristic of Cubitt's wider work. Eaton Place takes its name from Eaton Hall, in Cheshire, the country seat of the Grosvenor family. The earliest houses are located at the east end and were first occupied in 1828. The eastern section was finished by 1835, the centre by 1840 and the western end by 1845.

The 1869 OS map provides an early insight into the layout of the buildings in the terrace at this time, with a proliferation of outbuildings connecting the main house to the mews to the rear. The site itself appears to be completely enclosed with buildings with no outdoor amenity space visible, contrasting with its appearance today.

Primary evidence from a similar period of the construction of the terrace provides information on the likely layout and footprint of the buildings at the time. In 1855, Cesar Daly produced plans and elevation drawings of typical 'second rate' houses in Eaton Place that show the footprint of the buildings took up almost the entire plot of land, especially at lower ground floor, where the servants would be accommodated, and the majority of



Figure 2 1799 Horwood map showing indicative location of the site prior to the wider development of the area.



Figure 3 1869 OS map showing early detailed cartographic evidence of the site and the wider development. Note the entire plot appears to have been developed.

2. Historic Development

household tasks undertaken. Of note here is that it shows at least two storeys of building immediately adjacent to the rear of the main house, in the same location that it is proposed to constructed an extension to the site.

By the 1950s the site still appears to have retained this configuration with the whole plot being developed with the exception of the front light well.

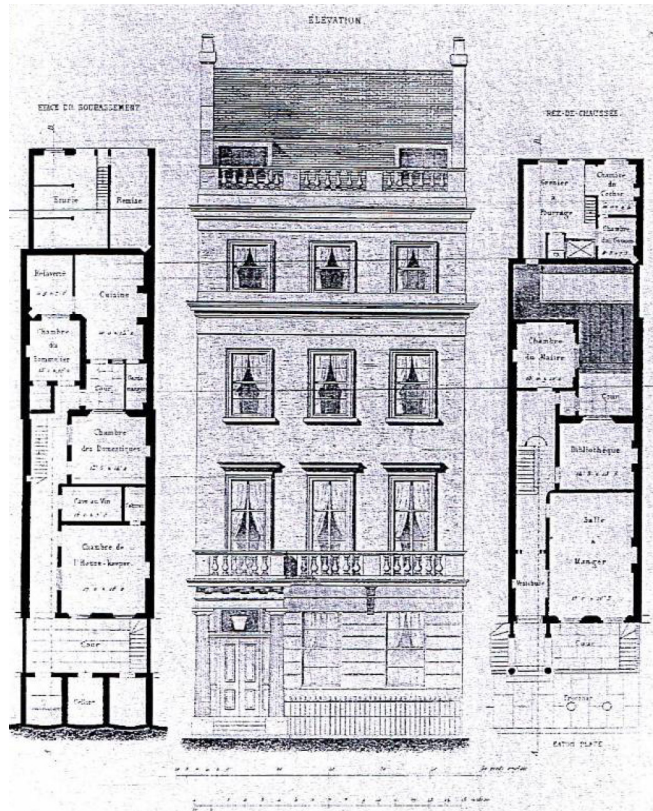


Figure 4 1855 plan and elevation of typical houses on Eaton Place by Cesar Daly. Note extensions to rear.



Figure 5 1951 OS map showing no change within the site.

3. Identification of Heritage Assets and Significance

An inspection of the relevant databases and sources, including the Historic Environment Record (HER), the National Heritage List for England (NHLE), and the Council's website, has identified numerous Heritage Assets lying within the vicinity of the Site. Following desk based research and on site analysis, professional judgement has been used to identify and select Heritage Assets whose significances may be affected by changes to their settings or direct impacts. This assessment has been undertaken in accordance with Historic England's *Statement of Heritage Significance: Analysing Significance in Heritage Assets* and Historic England's *Advice Note 12 The Setting of Heritage Assets GPA 3*. In accordance with Paragraph 194 of the NPPF the level of detail is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

The Heritage Assets that have the potential to be affected by the proposals are outlined below:

1. 4-34 Eaton Place, Grade II*
2. Belgravia Conservation Area

Several other Heritage Assets were identified as part of this process but were excluded from assessment due to either a lack of visible or experiential connection with the Site.

That following section provides a description of the assets above, followed by an assessment of their significance.



Figure 6 Showing the site (1) sitting in its wider listed terrace. The entire image is located within the Belgravia Conservation Area.

3. Identification of Heritage Assets and Significance

1. The Site/4-34 Eaton Place, Grade II*

4-34 Eaton Place was listed grade II* in 1958 and the listed description amended in 1987. The list description reads as follows:

TQ 2879 SW CITY OF WESTMINSTER EATON PLACE, SW1 97/40 (south side) 24.2.58 (except No 2) Nos 2 to 34 (even) GV II Grand terrace of houses. Early C19. Brick and stucco. Slate mansards. 3 storeys, attic, attic in mansard and basement. Each house 3 windows wide. Centre 3 houses, end houses and Nos 26 and 10 set forward slightly. With giant order of stucco pilasters rising through first and second storeys and pilaster strips to attic. Stucco to ground floors. Doric projecting porches to Nos 22, 24, 12 and 14, and Doric colonnade to centre 3 houses. Square headed windows, gauged heads. Sashes. Glazing bars. French casements to first floor. Continuous first floor balcony. Main cornice above second floor, subsidiary cornice to attic. Cast iron area railings.*

The terrace is of much architectural interest, forming an architectural set piece typical of the development of the area, establishing a formal hierarchy to the streetscape cementing a layout of primary and secondary streets. A grand appearance is created through the consistent bay rhythm and design as well as the length of the terrace itself. Details such as the central projecting portico to the centre, establishes additional visual and decorative interest. Details of interest include, square headed timber sashes to the main façade with gauged stucco above.

A continuous first floor balcony unites the whole composition, with French windows set behind. The terrace dates to the early nineteenth century and is representative of the wider redevelopment of the area establishing what would become Belgravia. As such the terrace retains much historic interest. Completed in brick and stucco the terrace also retains some evidential interest, showcasing contemporary building techniques and materials. The use of classical decorative order, in the Doric projecting porches and pilaster strips above is typical of the period and illustrates the popularity of a severe neo-classical style which would come to typify the development for widespread parts of west London.

The rear of the building is much more varied in its appearance, and has a confused and disjointed appearance. The fenestration pattern is irregular and features almost completely different windows to each level, detracting from its aesthetic interest. A considerable closet wing sits to the eastern side of the building which has a shallow, almost full height modern brick projection added on.

The first floor projecting bay sits awkwardly on the rear elevation and appears to be



Plate 1 Front facade of the site, as seen from Eaton Place.

3. Identification of Heritage Assets and Significance

constructed in later stock brick. It is unclear whether there was a structure originally here, but some heavily soiled brick work to its corner would suggest it was and was rebuilt at some point. The lower two storeys have been completely rendered obscuring any original brick work, and has a worn and unsightly appearance. Lower levels of buildings in during this period were often painted white to help increase the light levels, but this seems unlikely in this instance for three reasons:

- 1: The elevation is south facing with no tall buildings creating shade, so light would not have been a problem;
- 2: The brickwork is rendered rather than painted, suggesting that the render was required to repair damaged brickwork;
- 3: The OS maps show that the whole plot was built upon historically, as supported by Cesar Daly's plans. When these structure were demolished they would have left scarring to the buildings, supporting the theory that render was needed to obscure this damage.

As the proposals only relate to the rear extension, the interiors of the building will not be focused on in great detail, but to summarise, both the lower ground floor and ground floors have undergone significant changes over their history that have eroded original appearance and plan form. This was largely a result of the works undertaken when the building was converted to flats in 1948. The floors are of limited architectural or historic interest with the loss of the majority of its original features and plan form. It essentially retains a 'shell' of its historic appearance with some historic walls remaining. This was acknowledged by the council in the 2021 application where the commented:

The works proposed are minor and in a previous refurbishment, most of the original features and floorplan have been lost.



Plate 2 Note, lower levels are rendered, suggesting that extensions may have been present in these locations historically (supported by the early OS maps).

3. Identification of Heritage Assets and Significance



Plate 3 Showing rendered lower two storeys where the extension is proposed.



Plate 4 Showing disjointed appearance of the rear and unsympathetic awning above lower ground floor.



Plate 5 View looking away from the house that was historically developed land.

3. Identification of Heritage Assets and Significance



Plate 6 Showing ground floor room chimney breast, note no original features of interest remain.



Plate 7 General appearance of lower ground floor room showing no features of interest.



Plate 7 Showing ground floor room and patio doors to be removed for the extension. Note these doors are later additions.



Plate 8 Detail of modern patio doors to be removed

3. Identification of Heritage Assets and Significance



Plate 9 Showing ground floor room tripartite window to be removed as part of the rear extension.



Plate 10 Photo of same room showing modern walls in non traditional locations as a result of the conversion to flats in the 1940s.

3. Identification of Heritage Assets and Significance

2. Belgravia Conservation Area

Belgravia Conservation Area was first designated in 1968 and extended in 1990. 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. Eaton Place is recognised as a primary street, 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 housing form made common by Cubitt's much copied development plans.

The rear of the terrace that lines Eaton Place is highly varied in character, and its original appearance has been considerably eroded overtime, removing any uniformity that it may have once had. A review of aerial mapping shown in figures 8 and 9 has shown that many of the buildings within the terrace feature similar rear extensions to what is being proposed as part of this application.

As a result of the good-quality stock of buildings and townscape value, the Belgravia Conservation Area is considered to be of a high architectural and historic interest.

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 proliferations of alterations to the rear, and the loss of its original appearance, it is considered to be of less interest. The enclosed nature of the rear yard is such that the contribution of this area is reduced.

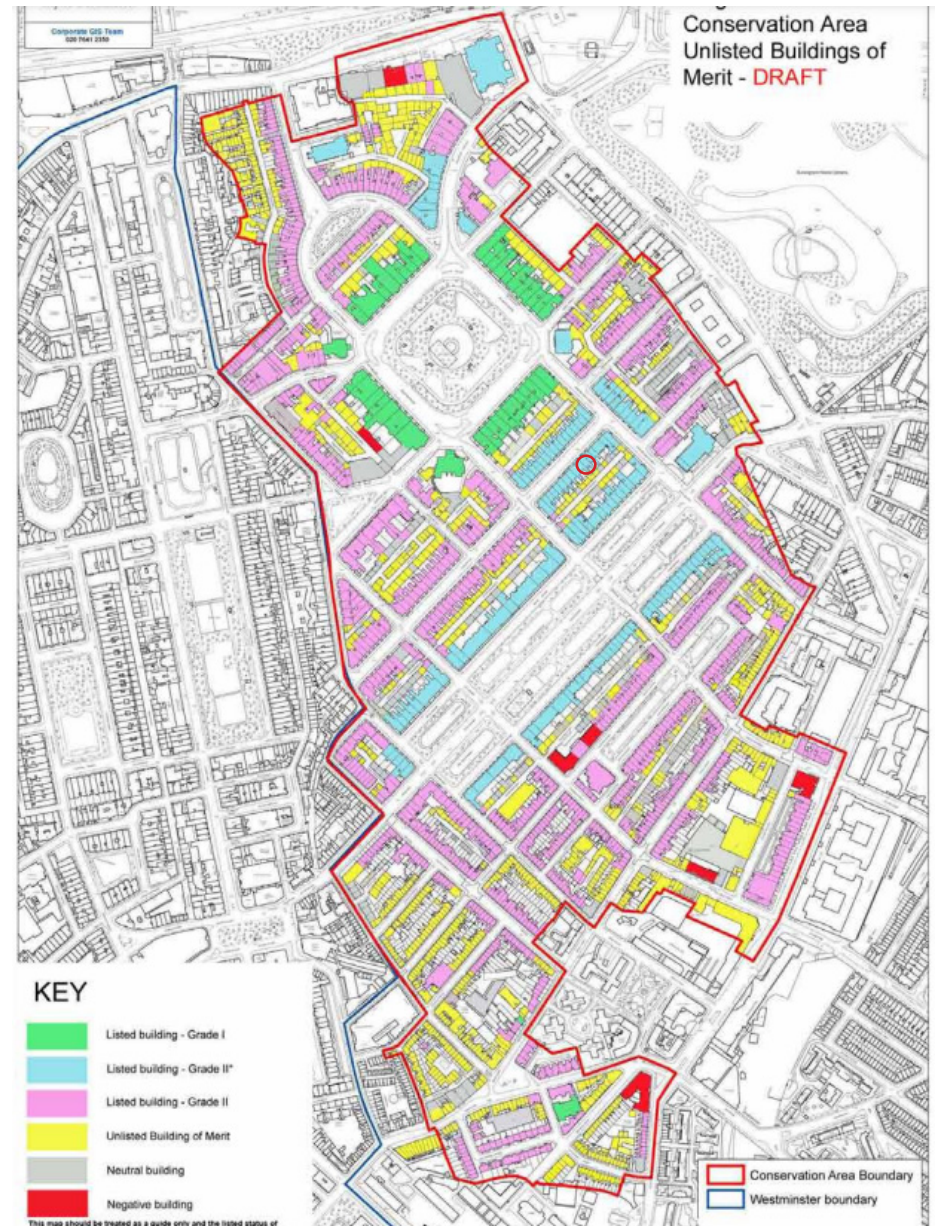


Figure 7 The Belgravia Conservation Area boundary showing quality of buildings in the area. The site is highlighted by a red circle.

3. Identification of Heritage Assets and Significance

Outlined below is an oblique aerial view showing the rear elevation of the listed terrace and buildings that have been identified as having similar rear extensions to what is being proposed as part of this application.



Figure 8 Oblique aerial view showing properties within the listed terrace with side extensions to the rear.



Figure 9 Oblique aerial view of the listed terrace showing properties with side extensions to the rear.

4. Planning History

There are numerous planning and listed building consent applications for the building available online. Two are directly relevant to this application. The first dates to 2021 (ref: 21/08219/LBC) and was for the:

Internal alterations at ground and lower ground floor levels, including to partitions.

In their delegated report the council stated:

Flat 1 occupies the lower ground and ground floor levels of this Grade II listed house. The works proposed are minor and in a previous refurbishment, most of the original features and floorplan have been lost. The works are therefore not considered to affect the special interest of the listed building and the application is considered acceptable.*

The application was granted listed building consent on 4th February 2022.

The second application relevant here dates to 2012 where listed building consent and planning permission applications (refs: 12/01609/FULL & 12/01569/LBC) were submitted for:

Erection of three storey rear extension at lower ground, ground and first floor level. Alterations to existing rear closet wing at first second and third floor levels.

The proposals were granted permission on the 6th June 2012. No delegated comments are available online to describe the council's reason for approving the scheme, but it is likely that consent was granted in light of the already considerable erosion of significance of the building, and the fact that contextually, the proposals would not be out of place with the rest of the conservation area.



Figure 10 Showing consented rear extension in elevation (left).

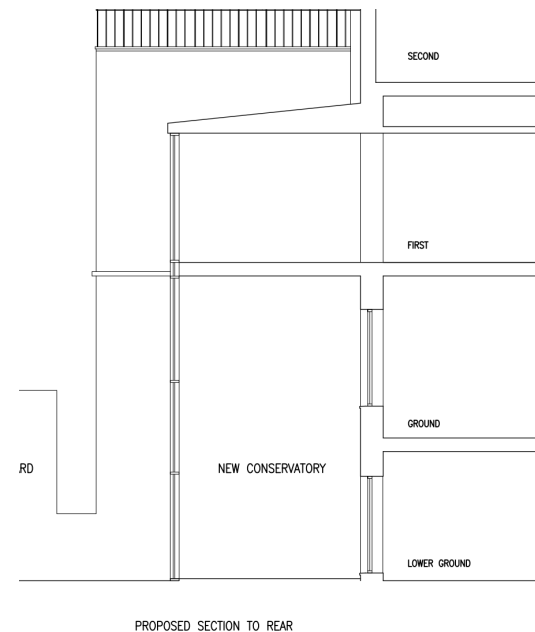


Figure 11 Showing 2012 consented rear extension in section.

5. Proposals and Assessment of Impact

Proposal

The proposals seek to install a 2.1 metre, two storey extension underneath the existing first floor closet extension. At ground floor level, the modern patio doors and side lights would be removed and nibs retained at each side of the wall to ensure the original rear building line is still legible. A new light weight, aluminium framed extension would then act as a small conservatory at this level in a similar architectural style to that of the 2012 consent, albeit with fewer glazing bars.

At ground floor level, it is proposed to remove the existing tripartite window and brickwork below to form an opening into the new extension. The detail of this would be similar to the existing extension at first floor level, with stock brick walls framing a multi-paned door enclosed by a Juliet balcony.

Assessment of Impact

It has been acknowledged by the council that most of the building's original features and floor plan have been lost. The primary significance of the building is derived from its facade and its wider contribution to the listed terrace. The rear of the building has suffered heavily from unsympathetic alterations over time and the lower levels especially have suffered from the removal of their outbuildings resulting in the enclosure of all its historic brickwork with render.

The proposed changes will slightly alter the plan form of the building through the extension of the rear rooms. However, the spaces have been so compromised already by later changes that this is not considered to have an overall negative impact. The proportions of the internal space would still be legible through the retention of large nibs, and no fabric of any great significance will be lost. In addition to this, there is clear evidence to suggest that there were outbuildings originally located to the rear of the building as supported in documentary evidence and on site analysis. As such, the proposals are not considered to cause harm to the overall significance of the listed building.

Similarly, the rear of the terrace features a wide variety of extensions, including many that feature extensions in the same location as the current proposals. As such, the proposals would not be out of keeping with the surrounding character and appearance of the conservation area, and would preserve its significance.

The proposals are therefore considered to cause no harm to the significance of the identified heritage assets and comply with sections 16 and 72 of the Planning (listed Buildings and Conservation Areas) Act 1990, the NPPF and the council's City Plan.

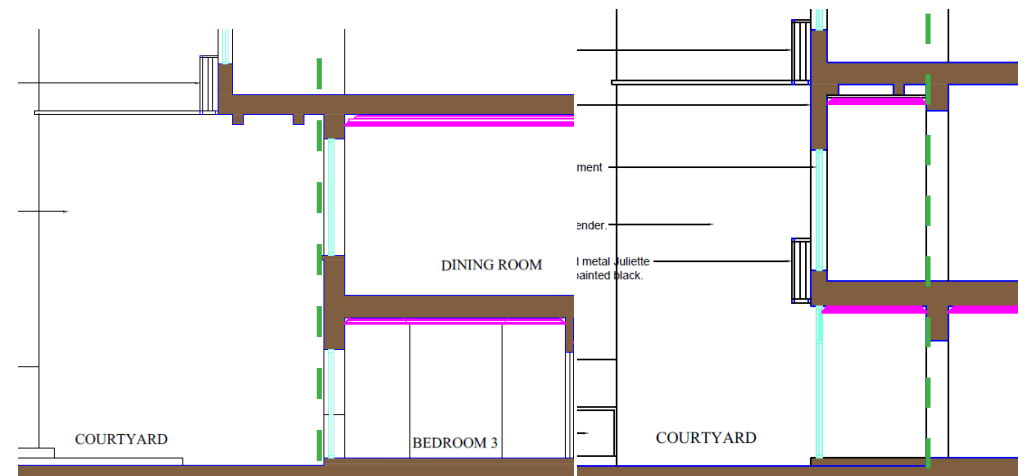


Figure 12 Existing section (left), proposed (right), compare to consented scheme below.

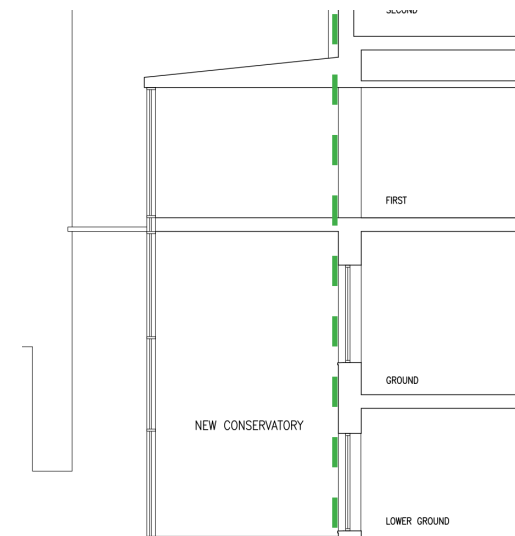


Figure 12 Showing section of consented scheme (ref: 12/01609/FULL). Green dashed line denotes existing rear line of building at lower ground and ground floors for reference. Note the consented scheme demolished the existing first floor extension and extended out considerably further.

Appendix 1: Legislation, Planning Policy and Guidance

Legislation

Legislation regarding Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (the 1990 Act).

Section 16(2) 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.

Section 66(1) states that, in considering whether to grant planning permission for development that affects a listed building or its setting, the local planning authority (LPA) or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest that it possesses.

Section 72(1) states that, in the exercise of planning functions, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

The term “preserve”, within the context of Section 66, has been defined within *South Lakeland District Council v Secretary of State [1992]*, where it was held that the “desirability of preserving” creates a presumption against harmful changes, but not a presumption against any change. Case law has established that the preservation of the setting of a listed building requires considerable importance and weight (i.e. the Barnwell Manor judgment) and that a decision-maker who has worked through the paragraphs of the NPPF in accordance with their terms will have complied with the statutory duty set out in the 1990 Act (i.e. the judgment in *Jones v Mordue & Others [2015]*).

In the judgment for *Palmer v Herefordshire Council* ([2016] EWCA Civ 106), a discussion on the balance between harm and benefit to a listed building was undertaken. It was accepted that “where proposed development would affect a listed building or its settings in different ways, some positive and some negative, the decision-maker may legitimately conclude that although each of the effects as an impact, taken together there is no overall adverse effect on the listed building or its setting”. In essence, where there is some harm and some benefit, these should be given the same weight, and where they are equal in measure, the effect on the listed building would be neutral, and thus its significance would be preserved.

This approach was confirmed in *City & Country Bramshill Ltd v Secretary of State for Housing, Communities And Local Government & Ors [2021]*. In this case Lord Justice Lindblom concluded that ‘the considerable importance and weight to the desirability of preservation [of the special architectural or historic interest of a listed building or its setting], should tip the scales to produce an unequal balance in its favour. However, the SoS should still take account of the actual severity of any change, or scale of change as the Mayoral SPG puts it, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm, and the

conflict with policy, should be a product of these factors.’

National Planning Policy Framework (2021)

The policies relevant to heritage are outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’. The NPPF places much emphasis on ‘significance’ which it defines as:

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence but also from its setting

The 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).

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 any conflict between the heritage asset’s conservation and any aspect of the proposal’.

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.’

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.

Paragraphs 201 and 202 discuss different levels of harm caused to heritage assets and 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 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.

With regards to conservation areas and the settings of heritage assets, paragraph 206 requires Local Planning Authorities to look for opportunities for new development to enhance or better reveal their significance.

Planning Practice Guidance

This guidance supports the NPPF and reiterates the importance of conserving heritage assets in a manner appropriate to their significance. Key elements of the guidance relate to assessing harm. An important consideration should be whether development proposals adversely affect a key element of the heritage asset’s significance:

‘it is the degree of harm, rather than the scale of development that is to be assessed’. The level of ‘substantial harm’ is stated to be a high bar, which may not arise in many cases. Whether development proposals cause substantial harm will be a judgment in the decision-taking process, having regard to the circumstances of the case and by applying the relevant NPPF policies. Such harm may arise from works to the heritage asset or from development within its setting. Setting is defined as:

the surroundings in which an asset is experienced, and may be more extensive than the curtilage.

A thorough assessment of the harm development proposals will have on this setting needs to consider, and be proportionate to, the heritage asset’s significance and the degree to which any changes enhance or detract from that significance, and the ability to appreciate and experience it.

Regional Planning Policy

The London Plan (2021)

Key extracts from the London Plan relating to this application are outlined below:

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,

Appendix 1: Legislation, Planning Policy and Guidance

robust materials which weather and mature well.

Policy HC1 Heritage conservation and growth

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 Planning Policy

Westminster City Plan (2021)

Key extracts from the City Plan include:

Policy 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

I. Development within the settings or affecting views of listed buildings will take opportunities to enhance or better reveal their significance.

Conservation Areas

K. 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.

L. 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.

Policy 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.

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.

Supplementary Planning Documents

Belgravia Conservation Area Audit (2013)

The Conservation Area Audit provides an analysis of the character and appearance of the conservation area to provide a framework for its future conservation and management.

Guidance Notes

Conservation Principles, Policies, and Guidance (English Heritage, April 2008)

This document outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in their own advice and guidance through the planning process, the document is commended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. This document was published in line with the philosophy of PPS5, yet remains relevant with the NPPF and PPG, the emphasis placed upon the importance of understanding significance to properly assess the effects of change to heritage assets. Guidance within the document describes a range of 'heritage values' that constitute a heritage asset's significance to be established systematically; the four main heritage values include: aesthetic, evidential, communal or historical. The document emphasises that:

considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment

Historic Environment Good Practice Advice in Planning Notes

GPA 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-making in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that:

...application proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

- Understand the significance of the affected assets;
- understand the impact of the proposal on that significance;
- avoid, minimise, and mitigate impact in a way that meets the objectives of the NPPF
- look for opportunities to better reveal or enhance significance;
- justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
- offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that direct physical change may affect heritage assets, or by change in their setting. Assessment of the nature, extent, and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of application proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

GPA 3: The Setting of Heritage Assets (December 2017) (2nd Edition)

This advice note focuses on the management of change within the setting of heritage assets. This guidance updates that previously published by English

Appendix 1: Legislation, Planning Policy and Guidance

Heritage (The Setting of Heritage Assets 2011) in order to ensure that it is fully compliant with the NPPF and is largely a continuation of the philosophy and approach of the 2011 document. It does not present a divergence in either the definition of setting or the way in which it should be assessed.

Setting is defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. The guidance emphasises that setting is not a heritage asset or a heritage designation and that its importance lies in what it contributes to the significance of the heritage asset itself. Elements of setting may make a positive, negative or neutral contribution to the significance of a heritage asset.

While setting is largely a visual concept, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors, including historic associations.

This document states that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset. It is further stated that the contribution made to an asset's significance by their setting will vary depending on the nature of the asset and its setting. Different heritage assets have the capacity to accommodate changes and, therefore, setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, Historic England recommend using a '5-step process' to assess any effects of a development proposals on the setting and significance of a heritage asset:

- Identifying the heritage assets affected and their settings;
- Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Assessing the effect of the development proposals on the significance of the heritage asset(s);
- Maximising enhancement and minimising harm;
- Making and documenting the decision and monitoring outcomes.