



Flat E, 42 Lancaster Gate, London

HERITAGE IMPACT ASSESSMENT (Rev A)

**THA Ref: TBC
July 2022**

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Cover: Lancaster Gate and Locale, 1865

1.0 Introduction

1.1 Purpose

The Heritage Advisory Ltd. has been commissioned to undertake this Heritage Impact Assessment by Mr Gronlund. The document addresses proposals for the minor internal reconfiguration of space at Flat E, 42 Lancaster Gate, London (**Figure 1**). The document sets out the historic evolution of both the site and wider locale, before identifying relevant heritage assets and discussing the potential for their significance to be affected by proposals.



Figure 1: 42 Lancaster Gate, 2007

1.2 Proposals

More specifically, proposals for which consent is sought comprise the minor internal reconfiguration of space, facilitating the better practical functioning of Flat E. As such, an open plan living, dining and kitchen space will be created at second floor. Across the third floor the existing configuration of space will be retained, however non-original features such as wardrobes within bedrooms and bathroom units, will be removed to facilitate the appropriate upgrading of space here. Finally, it is also proposed to install an energy efficient external heat pump unit on the terrace at second floor (**Figure 2**).



Figure 2: Proposed Southern Elevation

1.3 Heritage Assets

The application site, in conjunction with its immediately adjoining counterparts, was designated Grade II on 5th February, 1970. The list description for this may be summarised as follows:

Grand terrace of houses. 1865. John Johnson. Stucco. Slate mansard. 4 storeys and attic mansard. Rustications to ground floor. Paired projecting Doric porches with rusticated columns. Balustraded balcony to first floor, square-headed windows except to first floor where round headed. Sashes, plate glass. Dentil cornices above first floor, breaking forward over windows. Cornices to second floor windows. Architraves. Rich frieze and console cornice above third floor windows. Balustraded parapet to Nos 41 and 42 (missing to other houses). Central terrace in Lancaster Gate planned layout.

It is also located within the Bayswater Conservation Area, initially designated on 9th November, 1967 and within the setting of the Tower and Spire of Christ Church, designated

Grade II. Heritage assets of relevance to proposals therefore include (**Figure 3**):

1. 36-42 Lancaster Gate – Grade II – Designated 5th February, 1970;
2. 23-35 Lancaster Gate – Grade II – Designated 13th February, 1970;
3. 43-55 Lancaster Gate – Grade II – Designated 5th February, 1970;
4. Tower and Spire of Christ Church – Grade II – Designated 25th September 1951; and
5. Bayswater Conservation Area – Initially designated 9th November, 1967

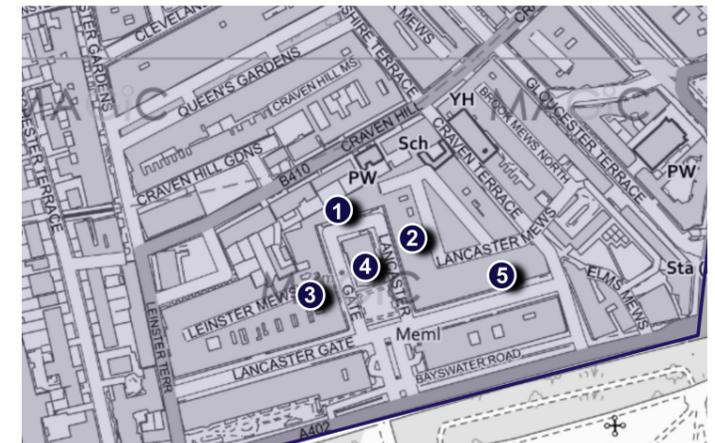


Figure 3. Distribution of Heritage Assets within Locale

1.4 Historic Environment Record (HER)

There are a number of entries within the Historic Environment Record for this area. None directly apply to the application site.

1.5 Archaeological Potential

Subject to consultation with curator at full planning stages.

1.6 Planning History

Although there are no specific applications in relation to Flat E, 42 Lancaster Gate, it is of relevance to note that

an application for the 'conversion of 7 self contained residential flats, rebuilding of rear extension and erection of mansard roof' was approved in 1998. As a result, it is demonstrable that the host structure (42 Lancaster Gate) has been subject to reconfiguration – considered to have diluted inherent interest and therefore architectural and historic significance – to facilitate twentieth century change of use. Further, more recent applications across individual flats demonstrates an already established in-principle acceptability of change as is being proposed in this application.

1.7 Consultations Undertaken

Pre-application advice was received from Westminster City Council on 8th June 2022. This document set out general comments and advice with regards to the proposed air source heat pump, refurbishing windows, floor levelling and new skirting, sliding doors: living room, utility cupboard, architrave: stairs, ceilings, bathrooms, and kitchen.

Although this document notes that the majority of works 'would be acceptable' a number of specific design recommendations were also provided. As a result, the applicant has sought to directly respond to this advice as part of the scheme now being submitted. Specific design iterations are consequently addressed, and their ultimate acceptability assessed, in more detail at **Section 3.0** below.

1.8 Approach & Methodology

In accordance with *paragraph 194* of the *National Planning Policy Framework (NPPF, 2021)* this Heritage Impact Assessment describes the significance of those heritage asset(s) with the potential to be affected; in a manner proportionate to both the assets' importance, and an understanding of the potential for impacts upon that significance. A number of published guidelines were adhered to, including:

- 1) **Methodology** – *Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12.* Historic England, 2019. (**Appendix 2**);
- 2) *The setting of Heritage Assets Historic England Good Practice Advice in Planning Note 3 (Second Edition).* Historic England, December 2017; and
- 3) *Conservation Principles for the Sustainable Management of the Historic Environment. Consultation Draft.* Historic England, November 2017.

2.0 Historic Background

- 2.1 In 1380, the area within which the application site is located was known as *Bayard's Watering Place*. The water was provided by a stream – later known as the Westbourne. Although a bayard historically meant a bay (chestnut) horse, it has been suggested that the name may have derived from a resident called Baynard. As a result, the hamlet was intermediately known as Bayswatering, while Bayswater was first recorded in 1659. Bayswater remained almost entirely undeveloped by the eighteenth century (Figures 4 & 5).



Figure 4: Bayswater. 1729

- 2.2 The development of Paddington began at the end of the Napoleonic Wars when the Bishop of London granted permission to the Grand Junction Canal Company to develop parts of his estate within the Paddington Canal Basin, to the north of Hyde Park, in 1795. Original plans (c.1805) were prepared by S.P. Cockerell (1753-1827), surveyor to the Bishop's Estate. Following his death in 1827, Cockerell was succeeded in the task by George Gutch (1790-1874).

Under Gutch's supervision, works commenced in 1807 and continued into the 1850's, extending to Bayswater and the Edgware and Harrow Roads.



Figure 5: Bayswater, 1761, John Rocque

- 2.3 Although development continued into the 1850's, it had slowed significantly by the 1820's. This was in part due to uncertainty concerning the responsibility for roads. It has also been attributed to the grandiose nature of Cockerell's plans, including his excessive use of space. Gutch proposed a far more dense development. The map extract below illustrates Gutch's final street plan, with the Bishop of London's estate being outlined in green; the Great Western Railway terminus in red; and the Paddington estate in yellow (Figure 6). Connaught Street and Connaught Square were begun in the late 1820s. It is at this point that the pace of development increased but remained intermittent.



Figure 6: Gutch's Plan, Extract

- 2.4 Gutch made other changes to the initial plan for the area, although proposals were still intended for the wealthy with more squares and larger houses being introduced. The Gothic St. John's Church was constructed between 1829-32, as were neighbouring houses, with Cambridge Square to the north and Oxford Square to the south. A projected 'Polygon Street', running southwest toward Lancaster Gate was intended to border Gloucester and Sussex Squares. The proposed west end of Berkeley Street West was widened to form Hyde Park Square, whilst a straight Hyde Park Gardens replaced the originally intended crescent.
- 2.5 Earlier houses had exposed brick walls and ground floor stucco, perpetuating an eighteenth-century tradition. Later terraces are all stucco and usually taller (around five storeys) with Doric porches, a format which was to become common in Bayswater. It was also during this period that the shift from standard classical motifs to more flamboyant Italianate styling can be traced. The final layout of tree-lined avenues, squares and crescents that had evolved by the late 1830s is noted by Pevsner as being '*more spatially coherent than any known in London until then, and as leafy as the best*'.
- 2.6 Inter-war development generally comprised two or three storey terraced housing of grey brick, in a Georgian manner. By the late 1950s, new apartments were built to the designs of Anthony Minoprio between Edgware Road and Sussex Gardens, along with offices opposite Paddington Station on Eastbourne Terrace, represented a more significant departure from Gutch's plan for this area.

Lancaster Gate

- 2.7 In 1853, Joseph Neeld and the chapter of Westminster leased their land south of Craven Hill and an ambitious scheme - from 1854-5 by F. & H. Francis - followed the then-new Christ Church. As a planned composition, Lancaster Gate dates to 1856-7; first with terraces by Sancton Wood of 1857, whilst

around the square, terraces by John Johnson date to 1865 (Figure 7).

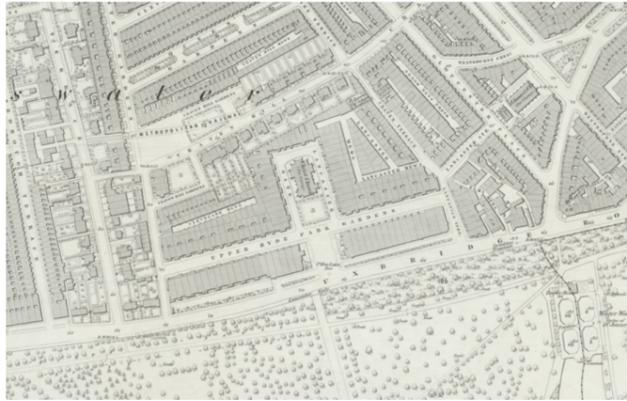


Figure 7: Lancaster Gate and Locale, 1865

2.8 Terraces were constructed on the scale of Hyde Park Gardens and also set back from the main road. Johnson's terraces were until 1865 known as Hyde Park Gardens, but thereafter as Lancaster Gate, although this name had been previously reserved for just the square surrounding the church. In 1868, these were reputed to be the most handsome in London. Wealthier residents were therefore quick to occupy, and these ranged from East India merchants to others merely moving from formerly more fashionable quarters to the newest and best residences available in the period.

2.9 Architect Johnson was born in 1807 and although not a member of the RIBA, began his career with honours, achieving the Gold Medallion of the Royal Society of Arts for a competition design of 1833; the silver medal of the R.A. in 1835; and the Travelling Studentship in 1836, with which he travelled in Italy until 1840, subsequently returning with sketches used to inform his ongoing work. The Builder Magazine of 1879 notes that this 'assisted no doubt, to develop the excellence he always displayed in detail and colour.' His obituary in the same magazine (1888) stated:

'His best works, perhaps best known to the general public, were the decorations of Her Majesty's Theatre for Mr. Lumley, and his designs for the Alexandra Palace; for the latter work, he was in 1877 made a Fellow of the Florentine Academy, an honour totally unexpected on his part, till he received his Diploma

through our Ambassador. His designs for the terraces at Lancaster Gate, and Prince's Gate, Hyde Park, for Sir John Kelk, are also well known. He published a book called "Johnson's Churches of Northampton", which for reference was highly useful to architects. Mr. Johnson was for some years District Surveyor for East Hackney; but though it was a lucrative appointment, he found it interfered with those occupations which were more congenial to his taste – and he resigned.

Though seventy-one years of age, he may be truly said to have died "in harness", for in 1878 he carried out an Italian design for a large mansion for Sir John Kelk at Tadworth, Wilts., at a cost of £45000; and also completed the design, details and contract for a church at the same place to cost £12000, which when finished will certainly be the most perfect of his works'.

2.10 Socially, Tyburnia (a part of Paddington created following Cockerell's masterplan) was spreading west, creating a carriage trade subsequently capitalised upon by William Whiteley. In 1879 there were seven M.P.s in Lancaster Gate, noted as having Paddington's 'largest and showiest cluster' of residences. By 1902 households included the Marquess of Alisa, the philanthropist Reginald Brabazon, Earl of Meath, and the engineer Lieut. Gen. Sir Richard Strachey. Sir Richard's son Lytton Strachey was raised – from 1884 – at no. 69 and always remembered a house of high crammed rooms, 'afflicted with elephantiasis'. Booth's 1889 Poverty Map for the area shows Lancaster Gate in yellow i.e. upper middle and upper classes, and comprehensively wealthy (Figure 8).



Figure 8: Descriptive Map of London Poverty, Booth, 1889

2.11 This remained the case and over the inter-war period, much of the area remained expensive. Lancaster Gate retained a density of between 61 and 78 persons per acre, remaining less crowded than Maida Vale in 1921 and 1931. In 1951, Lancaster Gate East - with 69.5 persons per acre - remained the borough's lowest density. As leases lapsed, development continued, albeit in a piecemeal manner. In 1935, demolition took place to facilitate flats over an office at the corner of Bayswater Road and Lancaster Gate; and in 1938, a block later called Lancaster was also constructed in Lancaster Gate. With respect to layout and size, the houses of Lancaster Gate have been described as 'Bayswater's most ambitious architectural achievement, although it has also earned disapproval for treating appearances as more important than the quality of life'; this latter comment perhaps reflecting the comments of Strachey.

2.12 The development purportedly takes its name from Lancaster Gate, a nearby entrance to Kensington Gardens, itself named in honour of Queen Victoria as Duke of Lancaster. Its buildings have been described as being 'Built as narrow houses of five or six storeys piled on top of a basement, the ranges are stuccoed and richly ornamented in a blend of 'English Baroque and French Mannerism'; the earliest parts have continuous colonnades along the ground and first floors. Behind the facades, most of the houses have been united to form clubs or hotels. Their regularity has been broken by several insertions, the most prominent being O. H. Leicester's Barrie House, raised to ten storeys, at the south-west corner of the square. The Body of Christ Church has been replaced by the six-storeyed Spire House, advertised in 1985 as '23 luxury flats'.

2.13 Whilst exteriors remain generally intact, with a few twentieth century infills, most interiors have been significantly reconfigured to facilitate the evolving needs and uses of individual and successive occupiers, despite a scarcity of bomb damage. Many are still in residential use and although these have been subdivided into smaller units. Other uses here include embassies, hotels, and offices.

3.0 Proposals

- 3.1 In brief, proposals for which consent is sought comprise the minor reconfiguration and upgrading of space across second and third floors of Flat E, 42 Lancaster Gate, including the provision of an open-plan kitchen, living and dining area, installation of an external air source heat pump, upgrading of bedrooms and bathrooms, and general necessary refurbishment works. Given the site's national designation and location within the wider conservation area, the historic evolution and resulting built form of the locale has been considered in conjunction with latest planning policy, specifically in order to propose appropriate design solutions that are in turn configured to ensure the preservation and / or enhancement of relevant heritage assets.
- 3.2 Across the second floor it is proposed to remove the existing floor finish within the living and dining area and lobby, replacing this with new oak flooring that will be laid in a herringbone style. Here it is of relevance to note that the existing flooring was installed during the 1990's and is acknowledged within the pre-application advice as comprising *'modern timber'*. It is therefore of no interest and/or significance to the host structure. Further, following removal of the existing flooring any original and/or historic floorboards below will be retained with new flooring being laid atop this in a manner that is wholly reversible without damage to historic fabric. This herringbone flooring is also proposed within the kitchen, ensuring aesthetic cohesion across this level.
- 3.3 It is also of relevance to note that the existing floor across second floor is currently uneven, deviating in places by approximately 40-50mm from the finished floor level. As such, it is proposed to install new timber firings to the existing floor joists, demonstrably facilitating the better practical functioning of space here. Whilst it is acknowledged that these works will require existing areas of skirting to be adjusted to meet the new floor level, this is highlighted as being *'crisply detailed and although stylistically appropriate, do not appear to be historic. As such, removing and replacing skirting sections is acceptable'*.
- 3.4 With specific regard to proposals for the kitchen it is once again of particular pertinence to highlight guidance contained within the pre-application advice document. An initial scheme sought to heighten the door lintel and architrave, however this was noted as *'appearing incongruous and out of proportion with the wall and ceiling heights'*. As such, the design was amended to include the removal of existing partitions that currently house the kitchen space, opening up this area. Whilst it is acknowledged the removal of partitions will result in the removal of existing cornicing, this is not an original feature and therefore of no significance. Such a design approach would demonstrably reference the original proportions and therefore significance of this aspect of the property. This aspect of the scheme was considered *'acceptable'* within the pre-application document.
- 3.5 Further, and as a direct consequence of pre-application advice, the scheme seeks the retention of hinged doors which provide access from the lobby to living space. Whilst those existing are acknowledged as dating from conversion works which were carried out during the 1990's they replicate historic openings found throughout Flat E, their retention is therefore considered appropriate.
- 3.6 Additionally, the existing doorway – providing access to the terrace – exhibits severe degradation in the form of broken glass and failing timber. It is therefore proposed to refurbish this. That this door is to be refurbished and not replaced is again a direct consequence of pre-application advice which states that *'though not historic, the door and ironmongery are good quality. Replacing broken glass and conducting timber repairs are acceptable works'*. Finally, many of the walls across this floor exhibit cracks, failing paintwork and other issues associated with an ongoing period of vacancy. It is therefore proposed to repair these (where necessary) and redecorate these rooms, again facilitating the necessary and appropriate upgrading of these spaces more generally.
- 3.7 Proposals across third floor predominantly seek to merely upgrade the existing space to meet the needs of current and future users. As such, a utility cupboard is proposed to be created where the original staircase leads to the floor above – albeit the provision of access of no longer achievable. It is proposed to install a platform and shelves within this space to facilitate the insertion of a washer / dryer. The platform and shelves will be wholly removable without harm to historic fabric, particularly where fixings will not be attached to the stairs, as advised within pre-application documentation. The ultimate acceptability of this aspect of the scheme is highlighted within relevant advice which states that *'using space beneath for a washing machine is acceptable'*.
- 3.8 It is also proposed to remove existing wardrobes within these rooms. These are also of a demonstrably later date of installation and limited interest otherwise, their removal will not impact negatively upon the significance of the host structure. Across this floor it is again proposed to remove the existing flooring i.e. non-original carpets, and replace this with oak flooring laid in a herringbone style. Again, the installation of this would not cause harm to historic fabric, whereby any floorboards beneath existing carpeting would be retained.
- 3.9 The scheme also seeks the wholesale regeneration of the existing bathroom and master en-suite. Here it is of relevance to note that existing sanitaryware is both non-original and therefore of no significance, but also exhibits instances of degradation in the form of damaged sanitaryware and cracked tiled. As a result, the scheme has limited changes to the layout of the en-suite bathroom and maintains the existing configuration of the guest bathroom with replacement of existing units with contemporary alternatives that both upgrade the current aesthetic here but also the overarching functionality. Within the pre-application document it is highlighted that as the bathroom walls are modern *'sliding pocket doors would not be harmful'* and that *'new sanitaryware is acceptable'*.

3.10 The lowering of existing ceilings is proposed across the front and rear rooms across third floor. It is also proposed to replace ceilings in totality within both bathrooms. Within the pre-application advice note it is stated that *'where ceilings are modern, replacement is acceptable and the slight increase in the depth due to using acoustic plaster would be acceptable in these circumstances. Ceilings should be carefully investigated and where historic ceilings survive, they should be retained in situ and left exposed'*.

3.11 **Figures 9 to 11** demonstrate that existing ceilings within these rooms are not original and their replacement is therefore demonstrably acceptable, particularly where these would facilitate better living conditions more generally, for example the reduction in noise from the flat above. Cornicing within these rooms is also not an original feature and therefore of limited significance.



Figure 9: Guest Bedroom Existing Ceiling



Figure 10: Master Bedroom Existing Ceiling



Figure 11: Existing Ceiling Material Assumed to Comprise Contemporary Multi-Finish Plaster

3.12 Across both second and third floors it is proposed to refurbish existing windows. Here it is of relevance to note that these exhibit both degradation and decay in the form of cracking and peeling. Additionally, and as corroborate within the pre-application advice document, existing glass within these windows is not historic, albeit the window frames themselves are. As such, it is proposed to replace existing single glazing with 10.8mm laminated panes, in conjunction with works associated with the general restoration of the historic frames i.e. sanding by hand, repairing cracks, redecorating and repainting to the historic colour. Such a scenario, whereby the thermal and sound performance of the windows, in conjunction with their overarching aesthetic enhancement, is considered *'acceptable'* by the Local Planning Authority.

3.13 Turning to exterior proposals, and as already noted, it is proposed to install an energy efficient air source heat pump at the second floor terrace. As part of the pre-application process the applicant offered two potential locations for an air source heart pump, with the case officer noting that *'Option 1, within the roof terrace is most appropriate, as this will minimise public views and uses existing wall openings. The pre-application drawing illustrates that the unit would not be visible from a sightline 50m away, though it should be noted that private views are also considered. It's recommended that a section of the decking be removed to ensure the ASHP is located as close to the terrace floor level as possible. The option of a screen was discussed on site. A screen would be acceptable, subject to confirmation of its size and*

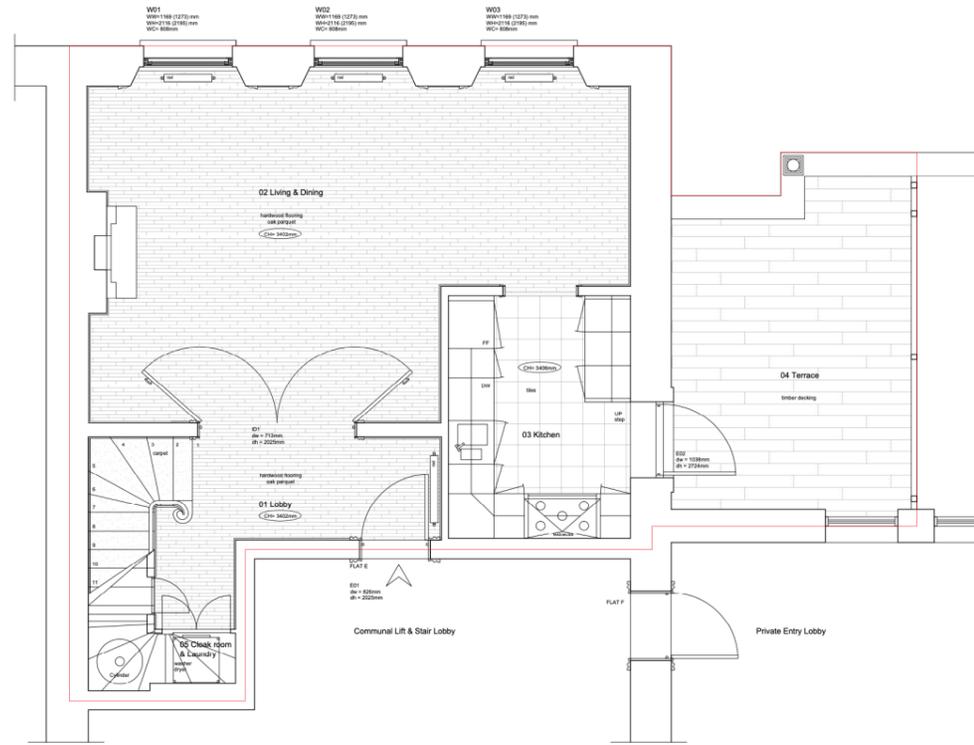
materials. Timber louvres should be used and verdant planting employed around, to limit visibility in private views'.

3.14 As such, the new air source heat pump would be installed at this lower level with a timber screen and associated climbing plants being installed to further limit wider and private perceptions and the potential for impacts upon the significance of the host structure. It is also of relevance to note that in order to install the air source heat pump in this location an existing opening within the wall (currently used for a water pipe) will be made wider. Whilst this aspect of the scheme would require the removal of historic fabric the quantum of removed fabric is minor with no impact upon significance given the established location of pipework here.

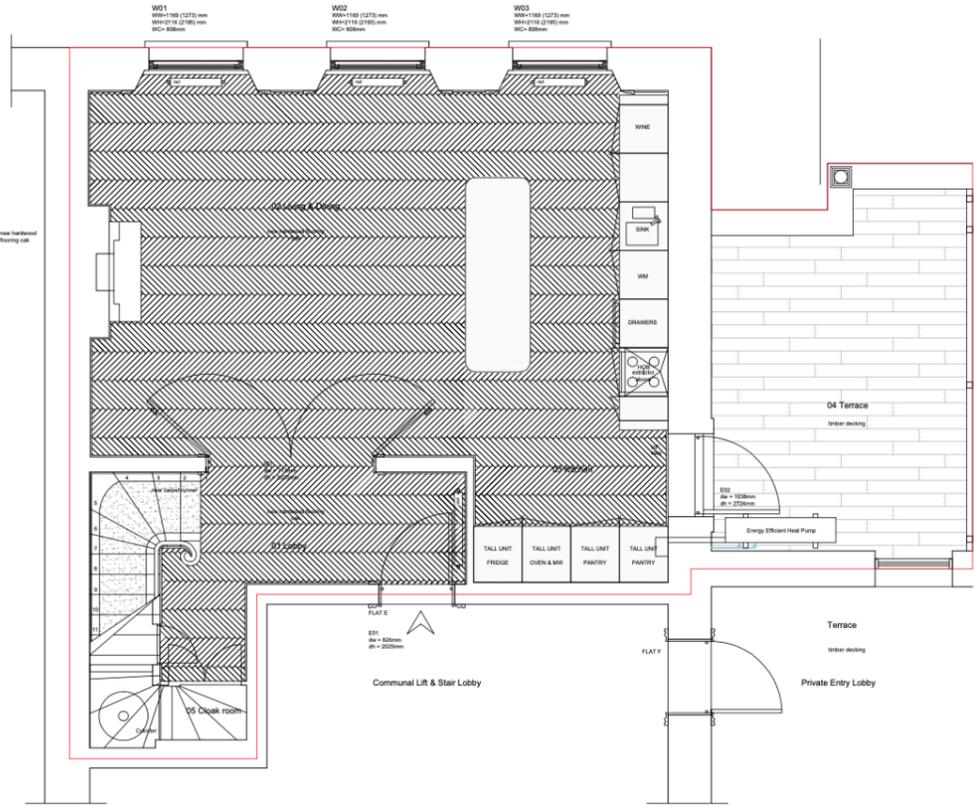
3.15 The installation of lines to the heat pump would not form a discernible change to this elevation given the existing pipework would be repurposed. It is also of relevance to note that the vents associated within the air source heat pump are proposed to be simple louvred openings to minimize visual impact, additionally they will be placed discreetly in the corners of the rooms, away from windows and doors in line with the guidance received as part of the pre-application process which states that *'these should be located discreetly in the corners of the rooms, away from windows and doors'*.

3.15 In sum, the implementation of proposals will engender the flat's long-term occupation and subsequent conservation, in conjunction with the *preservation* of the host structure as a direct consequence of securing its *optimum viable use*, in accordance with the relevant tests of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* and *NPPF*.

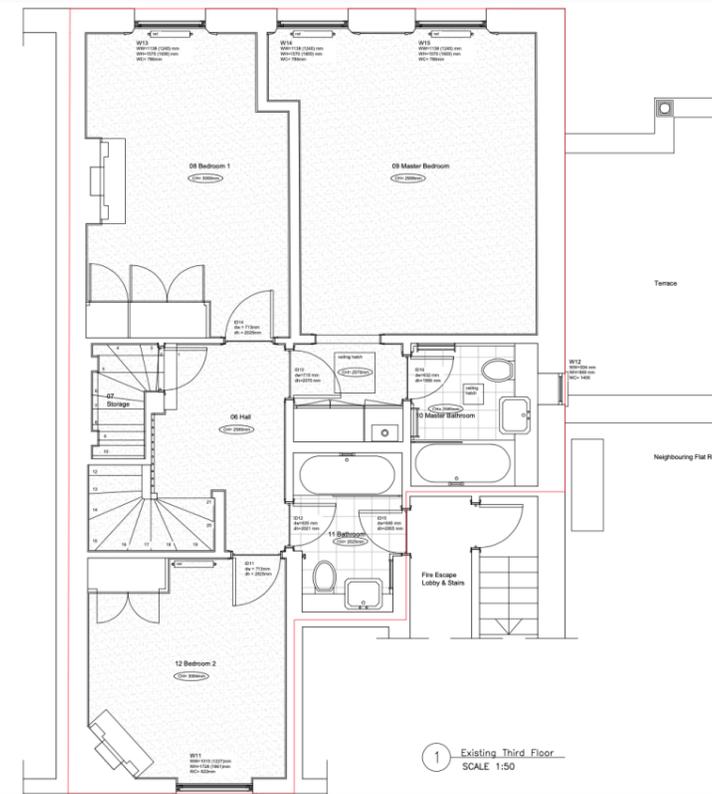
3.16 Further, external works would result in limited perceptible change ensuring the property continues to contribute to the significance of terrace of which it forms part and wider character and appearance of the conservation area. Proposals are not, therefore, considered to result in negative impacts upon the host structure or any other heritage assets of relevance, ensuring No. 42 Lancaster Gate continues to contribute positively to its inherently significant environs.



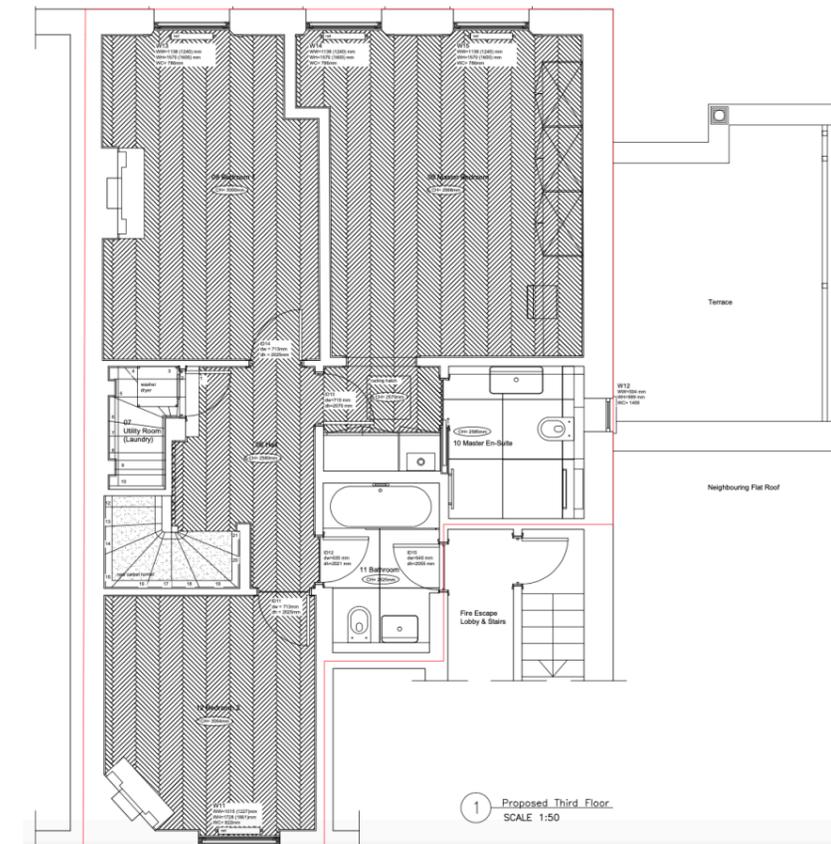
Existing Second Floor Plan



Proposed Second Floor Plan



Existing Third Floor Plan



Proposed Third Floor Plan

4.0 Assessment

4.1 The following table sets out all heritage assets found to be relevant to early proposals; their distance from the proposed development site; what degree of 'interest' they exhibit; their inherent significance; and, how the application site presently contributes towards this. The potential for impacts upon recognised significance is then identified, along with an assessment of how such impacts are able to be mitigated. At this juncture, it is important to note that - with respect to significance - the following extract from Historic England's website (*Living in a Grade I, Grade II* or Grade II Listed Building*, 15.09.2020) sets out the following hierarchy:

'Listed buildings come in three categories of 'significance':

- Grade I for buildings of the highest significance
- Grade II* and
- Grade II

Most listed buildings are likely to be of a Grade II status, where these make up 92% of all listed buildings.

Heritage Asset	Interest	Significance	Impact on Significance	Avoiding Impacts	Justification	Recording
<p>36-42 Lancaster Gate, Grade II</p> <p>List entry number: 1221692</p> <p>Date first listed: 05-Feb-1970</p>	<p>Archaeological interest: N/A.</p> <p>Architectural and Artistic Interest Yes. Architectural interest is apparent across the craftsmanship and construction of these properties including 'paired projecting Doric porches with rusticated columns', dentil cornices above first floor, breaking forward over windows, and 'rich frieze and console cornice above third floor windows'.</p> <p>Historic Interest: Yes. Historic interest is readily identifiable given the 19th century origins of these structures, forming a grand terrace of houses constructed as part of expansion during this period by John Johnson. It forms a readily identifiable instance of Lancaster Gate's planned layout, forming its central terrace.</p>	<p>The significance of these heritage assets is medium, given their Grade II designation. Their significance is most readily identifiable in views throughout Lancaster Gate, when this terrace is considered in isolation as part of a 'grand terrace' but also when viewed in conjunction with the wider, planned layout of Lancaster Gate itself. Here, it comprises one of a number of terraces planned by John Johnson around a square on land south of Craven Hill. It formed a component part of Paddington's 'largest and showiest cluster of residences' (1879). However, a number of these terraces, including No. 42, have been subject to ongoing internal alteration and reconfiguration since initial construction, primarily facilitating the division of these into self-contained apartments. This has resulted in the inevitable erosion of historic and architectural integrity, in turn diluting inherent significance, across internal areas.</p>	<p>As noted, all levels across No. 42 Lancaster Gate have been subject to ongoing alteration to facilitate the needs of previous and current owners / occupiers, diluting the inherent interest and therefore significance of room hierarchies. However, the internal reconfiguration of these cannot be considered to negatively impinge upon the wider significance of this heritage asset and its contribution to Lancaster Gate as a whole. Given the very minor nature of proposals, particularly when considered in conjunction with the scale of the wider terrace, the significance of the element to be affected by proposals is low. As noted, the significance of this heritage asset is most readily identifiable when considered in conjunction with its neighbouring counterparts at Lancaster Gate. Given the very limited perceptibility of proposals, coupled with recent instances of residential conversion within the site's immediate locale, proposals are not considered to impinge upon the ability to appreciate significance. The scheme would not, therefore, detract from the way in which this heritage asset is appreciated nor impact upon its associated patterns of use.</p>	<p>Proposals have sought to reduce the potential for impacts to accrue through the implementation of a high-quality, considered design. Therefore, they have been designed to ensure the flat's optimum viable use, long-term occupation and continued conservation, in turn facilitating the preservation of the wider heritage asset. More specifically, proposals have sought to respond to the host structure, with proposed rooms being configured as a direct consequence of existing fabric to be retained (in accordance with pre-application advice), with any additional elements being installed in such a manner that is wholly reversible without unnecessary damage to historic fabric. Where fabric is proposed to be removed, the quantum of removed fabric is minor and wholly necessary to facilitate the practical functioning of internal areas and is noted within relevant pre-application advice as 'acceptable'. Further, external works have been configured to limit any potential visual impacts upon private residents or the wider public, as such the air source heat pump will be installed at a lower level and screened by timber louvres and associated planting with associated pipework being disguised through the reuse of an existing network. Proposals are therefore considered to preserve the significance of this heritage asset and the contribution it makes to the wider streetscene and designated locale. Given the account set out above, the prevailing impact of proposals, following implementation, is considered positive.</p>	<p>Following the implementation of proposals, a beneficial impact is considered to result given that the scheme would engender the overarching enhancement of the site. Proposals therefore more than amply respond to the requirements of the <i>Planning (Listed Buildings and Conservation Areas) Act, 1990</i> whereby this heritage asset would be <i>preserved</i>. Additionally, through the implementation of a high-quality, considered and regenerative scheme proposals would more than amply fulfil the relevant requirements of the <i>NPPF</i>, particularly where <i>paragraph 190</i> sets out that the relevant local authority should take account of 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'. It is therefore considered that impacts upon the Grade II designated structure are beneficial, particularly where the scheme would engender the overarching enhancement and ongoing conservation of the heritage asset given its current period of obsolescence and associated degradation, in accordance with Policy HC1- Heritage Conservation and Growth within the London Plan, 2021. Finally, and for the many reasons set out above it is demonstrable that the scheme will engender the long-term conservation and maintenance of Flat E, and in turn No. 42 Lancaster Gate, in accordance with Policy 39 – Westminster's Heritage within Westminster's City Plan, 2019-2040.</p>	<p>Given the very limited impact upon the significance of this heritage asset and/or its setting, further archaeological analysis and recording is not deemed necessary for the purposes of this application.</p>

Heritage Asset	Interest	Significance	Impact on Significance	Avoiding Impacts	Justification	Recording
<p>23-35 Lancaster Gate, Grade II</p> <p>List entry number: 1275009</p> <p>Date first listed: 13-Feb-1970</p>	<p>Archaeological interest: N/A.</p> <p>Architectural and Artistic Interest Yes. Architectural interest is apparent across the craftsmanship and construction of the 'paired projecting Doric porches with rusticate columns', 'Ionic columns to centre window and segmental pediment over' and 'rich frieze and console cornice above third floor windows'.</p> <p>Historic Interest: Yes. Historic interest is readily identifiable given the 19th century origins of these structures, forming a grand terraces of houses constructed as part of expansion during this period by John Johnson and that they form an 'integral part of Lancaster Gate planned layout' and matching terrace to Nos 43 to 55'.</p>	<p>The significance of this heritage asset is medium, given its Grade II designation. Nos 23-35 were also constructed as part of John Johnson's planned layout of grand terraces, located to the north of Hyde Park. This terrace is acknowledged as 'matching Nos 43 to 55' within the list description, located on the opposite side of the square. Therefore, the significance of this heritage asset is most readily identifiable when considered in conjunction with its 'matching' counterpart and row of terraces to the north (of which the application site forms part). The host structure, of which the application site forms part, therefore demonstrably positively contributes to the significance of this heritage asset's setting.</p>	<p>As noted, the significance of these heritage assets is most readily identifiable when Lancaster Gate and its component terraces are considered in totality. Proposals do not seek to alter the current streetscape or the site's individual contribution to this, with proposed works being predominantly focused upon internal areas. Impacts upon the significance of these heritage assets are therefore considered neutral. Given the very minor nature of proposals, in conjunction with an established in-principle acceptability of internal reconfiguration across individual apartments, the scheme is not considered to impinge upon the ability to appreciate these heritage assets or their significance. Proposals would therefore ensure the site's long-term conservation, preservation and continued contribution to the wider significance of this terrace and is not considered to detract from the way in which these heritage assets are appreciated, nor impact upon their associations and patterns of use.</p>	<p>Proposals have sought to reduce the potential for impacts to accrue through the implementation of a high-quality, considered design. More specifically, proposals will ensure limited to no perceptible change to the exterior of the existing building, whilst also securing the long-term occupation of the application site itself, in turn ensuring the host structure continues to contribute to the significance of the setting of this heritage asset and the planned square of which it forms part. Given the account set out above – whereby proposals would more than amply enhance interior areas of the application site ensuring its committed ownership and long-term preservation, and therefore the contribution this makes to the significance of these heritage assets - the prevailing impact, following implementation is considered positive, albeit minor.</p>	<p>Following the implementation of proposals, a beneficial impact is considered to accrue; particularly given that the scheme would engender the overarching enhancement and optimum viable use of the flat and, in turn, the host structure of which it forms part, preserving the positive contribution toward the wider historic environment. With respect to the relevant tests of the <i>NPPF</i> (re: <i>paragraph 197</i>), proposals have taken account of the desirability of sustaining the significance of the heritage asset, and the contribution this makes to the setting of all other heritage assets of relevance. Therefore, proposals ensure that perceptions of the host structure would be preserved and not negatively impinged upon, as per the relevant tests of the <i>Planning (Listed Buildings and Conservation Areas) Act, 1990</i>. It is therefore considered that impacts upon the Grade II designated structure are beneficial, particularly where the scheme would engender the overarching enhancement and ongoing conservation of the heritage asset, in accordance with Policy HC1- Heritage Conservation and Growth within the London Plan, 2021. Finally, and for the many reasons set out above it is demonstrable that the scheme will preserve the host structure and its special interest, in accordance with Policy 39 – Westminster's Heritage within Westminster's City Plan, 2019-2040.</p>	<p>Given the very limited impact upon the significance of this heritage asset and/or its setting, further archaeological analysis and recording is not deemed necessary for the purposes of this application.</p>

Heritage Asset	Interest	Significance	Impact on Significance	Avoiding Impacts	Justification	Recording
<p>43-55 Lancaster Gate, Grade II</p> <p>List entry number: 1221693</p> <p>Date first listed: 05-Feb-1970</p>	<p>Archaeological interest: N/A.</p> <p>Architectural and Artistic Interest</p> <p>Yes. Architectural interest is apparent across the craftsmanship and construction of the <i>'paired projecting Doric porches with rusticate columns', 'Ionic columns to centre window and segmental pediment over'</i> and <i>'rich frieze and console cornice above third floor windows'</i>.</p> <p>Historic Interest:</p> <p>Yes. Historic interest is readily identifiable given the 19th century origins of these structures, forming a grand terraces of houses constructed as part of expansion during this period by John Johnson and that they form a <i>'Matching terrace to Nos 23 to 35 (qv) and integral part of Lancaster Gate planned layout'</i>.</p>	<p>The significance of this heritage asset is medium, given its Grade II designation. Nos 43-55 were also constructed as part of John Johnson's planned layout of grand terraces, located to the north of Hyde Park. This terrace is acknowledged as <i>'matching Nos 23 to 35'</i> within the list description, located on the opposite side of the square. Therefore, the significance of this heritage asset is most readily identifiable when considered in conjunction with its <i>'matching'</i> counterpart and row of terraces to the north (of which the application site forms part). The application site therefore demonstrably positively contributes to the significance of this heritage asset's setting.</p>	<p>As noted, the significance of these heritage assets is most readily identifiable when Lancaster Gate and its component terraces are considered in totality. Proposals do not seek to alter the current streetscape or the site's individual contribution to this, with proposed works being primarily focused upon internal areas. Impacts upon the significance of these heritage assets are therefore considered neutral. Given the very minor nature of proposals, in conjunction with an established in-principle acceptability of internal reconfiguration across individual apartments, the scheme is not considered to impinge upon the ability to appreciate these heritage assets or their significance. Proposals would therefore ensure the site's long-term conservation, preservation and continued contribution to the wider significance of this terrace. The scheme would not, therefore, detract from the way in which these heritage assets are appreciated, nor impact upon their associations and patterns of use.</p>	<p>Proposals have sought to reduce the potential for impacts to accrue through the implementation of a high-quality, considered design. More specifically, proposals will ensure limited to no wider perceptible change to the exterior of the existing building, whilst also securing the long-term occupation of the application site itself, in turn ensuring the host structure continues to contribute to the significance of the setting of this heritage asset and the planned square of which it forms part. Given the account set out above – whereby proposals would more than amply enhance interior areas of the application site ensuring its committed ownership and long-term preservation, and therefore the contribution this makes to the significance of these heritage assets - the prevailing impact, following implementation is considered positive, albeit minor.</p>	<p>Following the implementation of proposals, a beneficial impact is considered to accrue; particularly given that the scheme would engender the overarching enhancement and optimum viable use of the flat and, in turn, the host structure of which it forms part, preserving the positive contribution toward the wider historic environment. With respect to the relevant tests of the <i>NPPF</i> (re: <i>paragraph 197</i>), proposals have taken account of the desirability of sustaining the significance of the heritage asset, and the contribution this makes to the setting of all other heritage assets of relevance. Therefore, proposals ensure that perceptions of the host structure would be preserved and not negatively impinged upon, as per the relevant tests of the <i>Planning (Listed Buildings and Conservation Areas) Act, 1990</i>. It is therefore considered that impacts upon the Grade II designated structure are beneficial, particularly where the scheme would engender the overarching enhancement and ongoing conservation of the heritage asset, in accordance with Policy HC1- Heritage Conservation and Growth within the London Plan, 2021. Finally, and for the many reasons set out above it is demonstrable that the scheme will preserve the host structure and its special interest, in accordance with Policy 39 – Westminster's Heritage within Westminster's City Plan, 2019-2040.</p>	<p>Given the very limited impact upon the significance of this heritage asset and/or its setting, further archaeological analysis and recording is not deemed necessary for the purposes of this application.</p>

Heritage Asset	Interest	Significance	Impact on Significance	Avoiding Impacts	Justification	Recording
<p>Tower and Spire of Christ Church, Grade II</p> <p>List entry number: 1275008</p> <p>Date first listed: 25-Aug-1951</p>	<p>Archaeological interest: N/A.</p> <p>Architectural and Artistic Interest Yes. Architectural interest is most readily identifiable across existing elements including its '3 main stages with paired bell louvres to third stage', 'corner buttresses and recessed spire to openwork parapet', and '3 stages of lucarnes to alternate faces'.</p> <p>Historic Interest: Yes. Historic interest is apparent given that this church was constructed in conjunction with the wider planned layout of Lancaster Gate, of which it forms a readily identifiable instance of 19th century growth here. That this is the case is indicated within the list description which notes that this structure is included <i>for its group value only</i>'. Historic interest is also apparent given the structure's 20th century residential extension and conversion, indicating ongoing evolution here.</p>	<p>The significance of this heritage asset is medium, given its Grade II designation. Again, the significance of this heritage asset is most readily identifiable when considered in conjunction with all the terraces that enclose it, forming Lancaster Gate. However, it is of relevance to note that this was subject to conversion to residential use and associated extension to the north and east during the 20th century. As a result, the list description notes that these later additions are <i>'not of special interest'</i>. The official listing also highlights that this heritage asset was <i>'included for group value only'</i>, again indicating that the significance of this is most readily identifiable when Lancaster Gate, and its constituent buildings, are considered in conjunction.</p>	<p>As noted, the significance of this heritage asset is most readily identifiable when considered in conjunction with the terraces that form the planned square of which it forms part. Given that proposals are predominantly focused across internal areas, they are not considered to negatively impact upon the wider terrace of which the host structure forms part, and do not impinge upon the way in which this heritage asset and its inherent significance, is perceived; particularly from the wider, designated public realm. Proposals would not therefore impact negatively upon the application site's contribution toward the setting of Tower and Spire of Christ Church, with the resulting impact on significance being considered neutral. Nor would proposals impinge negatively upon the way in which the significance of these heritage assets is appreciated, particularly when the limited nature of change is considered in conjunction with the relevant planning history of Lancaster Gate, which more than amply demonstrates an in-principle acceptability with respect to alteration; not only in this location but across the application site itself.</p>	<p>Proposals have sought to reduce the potential for impacts to accrue through the implementation of a high-quality, considered design. More specifically, proposals will ensure no perceptible change to the exterior of the existing building, whilst also securing the long-term occupation of the application site itself, in turn ensuring the host structure continues to contribute to the significance of the setting of this heritage asset and the planned square of which it forms part. Given the account set out above – whereby proposals would more than amply enhance interior areas of the application site ensuring its committed ownership and long-term preservation, and therefore the contribution this makes to the significance of these heritage assets - the prevailing impact, following implementation is considered positive, albeit minor.</p>	<p>Following the implementation of proposals, a beneficial impact is considered to accrue; particularly given that the scheme would engender the overarching enhancement and optimum viable use of the flat and, in turn, the host structure of which it forms part, preserving the positive contribution toward the wider historic environment. With respect to the relevant tests of the <i>NPPF</i> (re: <i>paragraph 197</i>), proposals have taken account of the desirability of sustaining the significance of the heritage asset, and the contribution this makes to the setting of all other heritage assets of relevance. Therefore, proposals ensure that perceptions of the host structure would be preserved and not negatively impinged upon, as per the relevant tests of the <i>Planning (Listed Buildings and Conservation Areas) Act, 1990</i>. It is therefore considered that impacts upon the Grade II designated structure are beneficial, albeit minor, particularly where the scheme would engender the overarching enhancement and ongoing conservation of the heritage asset, in accordance with Policy HC1- Heritage Conservation and Growth within the London Plan, 2021. Finally, and for the many reasons set out above it is demonstrable that the scheme will preserve the host structure and its special interest, in accordance with Policy 39 – Westminster's Heritage within Westminster's City Plan, 2019-2040.</p>	<p>Given the very limited impact upon the significance of this heritage asset and/or its setting, further archaeological analysis and recording is not deemed necessary for the purposes of this application.</p>

Heritage Asset	Interest	Significance	Impact on Significance	Avoiding Impacts	Justification	Recording
<p>Bayswater Conservation Area</p> <p>Initially designated: 09-Nov-1967</p>	<p>Within the <i>Bayswater Conservation Area Audit</i> it is explained that the character and appearance of this conservation area is derived from a 'unity' created through the consistent use of 'pedimented windows, sometimes with pilasters; grand entrance porches with Doric or Tuscan columns; stucco treated as rustication to the ground floor; elaborate basement area railings; iron balconies; projecting cornices or sometimes pierced parapets fronting mansard roofs with dormers'.</p>	<p>The significance of this heritage asset is medium by virtue of its conservation area designation. The application site - comprising <i>stucco, Doric porches, and dentil cornices above first floor</i> – in conjunction with its immediately adjoining neighbours which form an aesthetic 'unity' - therefore demonstrably exhibits features that contribute positively toward both the character and appearance of the wider conservation area.</p>	<p>Given that proposals are predominantly focused across internal areas, with limited perceptibility across proposed external aspects, they are not considered to negatively impact upon the wider terrace of which the host structure forms part, nor do they impinge upon the way in which this heritage asset and its inherent significance, is perceived; particularly from the wider, designated public realm. Proposals would not therefore impact negatively upon the application site's contribution to the wider character and appearance of Bayswater Conservation Area. Nor would proposals impinge negatively upon the way in which the significance of these heritage assets is appreciated, particularly when the limited nature of change is considered in conjunction with the relevant planning history of Lancaster Gate, which more than amply demonstrates an in-principle acceptability with respect to alteration; not only in this location but across the application site itself. Impacts upon significance are therefore considered neutral.</p>	<p>Proposals have sought to ensure that no negative impacts upon the significance and special interest would accrue following the implementation of proposals. Therefore, they have been developed to ensure the host structure continues to contribute positively toward identified key features; thus facilitating the preservation of the character and appearance of this heritage asset. More specifically, the very minor nature of proposals, in conjunction with limited perceptible change to the exterior of the property, would facilitate the long-term committed ownership, maintenance and fundamental conservation of this, in turn securing its ongoing preservation and continued contribution toward the significance of the wider terrace. Given the account set out above – whereby proposals would more than amply enhance interior areas of the application site ensuring its committed ownership and long-term contribution to the wider character and appearance of this area - the prevailing impact, following implementation is considered positive, albeit minor.</p>	<p>Following the implementation of proposals a beneficial impact is considered to result given that the scheme would engender the overarching enhancement of the flat. Proposals therefore more than amply respond to the requirements of the <i>Planning (Listed Buildings and Conservation Areas) Act, 1990</i> whereby the host structure and contribution this makes to the wider character and appearance of the conservation area is <i>preserved</i>. It is therefore considered that impacts upon the Grade II designated structure are beneficial, particularly where the scheme would engender the overarching enhancement and ongoing conservation of the heritage asset, in accordance with Policy HC1- Heritage Conservation and Growth within the London Plan, 2021. Finally, and for the many reasons set out above it is demonstrable that the scheme will preserve the current contribution the host structure makes to the character and appearance of the conservation area, in accordance with Policy 39 – Westminster's Heritage within Westminster's City Plan, 2019-2040.</p>	<p>Given the very limited impact upon the significance of this heritage asset and/or its setting, further archaeological analysis and recording is not deemed necessary for the purposes of this application.</p>

5.0 Summary

- 5.1 The application site encompasses the second and third floors of Flat E, 42 Lancaster Gate. Lancaster Gate was constructed in 1865 by John Johnson as a planned square of grand terraces. These residences become the *'largest and showiest cluster'* within the area. However, most of the interiors of all properties that comprise the terraces of Lancaster Gate have been subject to division of space following conversion to residential and/or commercial uses. These now represent significantly reconfigured interiors, although the exteriors remain generally intact.
- 5.2 Such a scenario can be seen to have occurred at No. 42 Lancaster Gate, whereby an application for *'conversion to 7 self-contained residential flats, rebuilding of rear extension and erection of mansard roof'* was approved on 26th August, 1998. It is therefore demonstrable that the host structure has been subject to internal works, necessary to facilitate the practical functioning of seven self-contained flats, that are considered to dilute inherent significance here.
- 5.3 Despite significant interior alteration, the host structure – in conjunction with the terrace of which it forms a component part – was designated Grade II on 13th February 1970. Other heritage assets of relevance to this application include 23-35 Lancaster Gate, Grade II; 43-55 Lancaster Gate, Grade II; Tower and Spire of Christ Church, Grade II; and Bayswater Conservation Area. Principally, proposals comprise the minor reconfiguration of space at second and third floors, including the levelling of floors, opening up of space at second floor, installation of an external air source heat pump, and necessary upgrading and regeneration works.
- 5.4 Proposals seek to engender the optimum viable use of the flat, consistent with its long-term occupation and subsequent conservation, particularly given its recent period of obsolescence and inevitable degradation. The site-specific scenario would therefore be more than
- amply enhanced following implementation with the host structure demonstrably being preserved as a consequence. Impacts upon 42 Lancaster Gate, the wider terrace of which it forms part, and all other heritage assets of relevance have therefore been assessed as being beneficial – albeit minor given the very limited scale of proposed change.
- 5.5 Proposals can therefore be seen to respond to the relevant sections of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, where they seek to *preserve* the listed building and its contribution to the wider character and appearance of the conservation area. The scheme also accords with the wider regulatory context, where *paragraph 190* of the *NPPF* sets out that the relevant local authority should take account of *'the desirability of sustaining and enhancing the significance of heritage assets'*.
- 5.6 Additionally, following the implementation of proposed works, it is considered that the building will continue to contribute toward the wider character and appearance of this area, particularly where *paragraph 197* sets out that *'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'*.
- 5.7 The scheme is therefore considered to have responded positively to the locale's historic context and achieved a high standard of design that results in no adverse impacts upon the host building itself or wider identified heritage assets or their *settings*. For this reason, the principle of conversion is not considered to be at odds with the significance of the application site and/or its wider locale.

6.0 Sources of Information

National Planning Policy Framework, 2021

Planning (Listed Buildings and Conservation Areas) Act, 1990

Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12. Historic England, 2019. (**Appendix 2**);

The setting of Heritage Assets Historic England Good Practice Advice in Planning Note 3 (Second Edition). Historic England, December 2017;

Conservation principles for the Sustainable Management of the Historic Environment. Consultation Draft. Historic England, November 2017;

<https://www.british-history.ac.uk/vch/middx/vol9/pp204-212#p31>

https://mapservices.historicengland.org.uk/printwebservicehle/StatutoryPrint.svc/431144/HLE_A4L_Grade%7CHLE_A3L_Grade.pdf

<https://historicengland.org.uk/listing/the-list/list-entry/1275009>

Westminster City Plan, April 2021, City of Westminster

London Plan, March 2021

Appendix 1.0 Designation Records for Heritage Asset(s)

The application site forms a component part of a wider designated heritage asset, it is also located within a conservation area and the setting of a number of statutory designated heritage assets including:

1) 36-42 Lancaster Gate, Grade II

List entry number: 1221692

Date first listed: 05-Feb-1970

Details: Nos 36 to 42 (consec) GV II Grand terrace of houses. 1865. John Johnson. Stucco. Slate mansard. 4 storeys and attic mansard. Rustications to ground floor. Paired projecting Doric porches with rusticated columns. Balustraded balcony to first floor, square-headed windows except to first floor where round headed. Sashes, plate glass. Dentil cornices above first floor, breaking forward over windows. Cornices to second floor windows. Architraves. Rich frieze and console cornice above third floor windows. Balustraded parapet to Nos 41 and 42 (missing to other houses). Central terrace in Lancaster Gate planned layout.

2) 23-35 Lancaster Gate, Grade II

List entry number: 1275009

Date first listed: 13-Feb-1970

Details: Nos 23 to 35 (consec) GV II Grand terrace of houses. 1865. John Johnson. Stucco. Slate mansard. 4 storeys and attic mansard. Full attic storeys up to Nos 24 and 25. Each house 3 windows wide. Rustication to ground floor, treated as pilasters to Nos 25 and 26. Paired projecting Doric porches with rusticated columns. Balustraded balcony to first floor. Square headed windows except for first floor, which round headed; those to Nos 25 and 26 with Ionic columns to centre window and segmental pediment over. Plate glass, sashes. Dentil cornices above first floor, breaking forward over windows. Cornices to second floor windows. Architraves. Rich frieze and console cornice above third floor windows. Subsidiary cornice to attic and balustraded parapet to Nos 24 and 25, incorporating arched dormer to No 26. No 23 with return to right. Matching terrace to Nos 43 to 55 (qv) and integral part of Lancaster Gate planned layout.

3) 43-55 Lancaster Gate, Grade II

List entry number: 1221693

Date first listed: 05-Feb-1970

Details: Nos 43 to 55 (consec) GV II Grand terrace of houses. 1865. John Johnson. Stucco. Slate mansard. 4 storeys and attic mansard. Full attic storey to Nos 53 and 54. Each house 3 windows wide. Rusticated ground floors, treated as pilasters to Nos 52 and 53. Paired projecting Doric porches with rusticated columns. Balustraded balcony to first floor. Square-headed windows, except to first floor, which round headed, those to Nos 52 and 53 with Ionic columns to centre window and segmental pediment over. Plate glass, sashes. Dentil cornices above first floor, breaking forward over windows. Cornices to second floor windows. Architraves. Rich frieze and console cornice above third floor windows. Subsidiary cornice to attic and balustraded parapet to Nos 52 and 53, incorporating arched dormers. No 55 with return to right. Matching terrace to Nos 23 to 35 (qv) and integral part of Lancaster Gate planned layout.

4) Tower and Spire of Christ Church, Grade II

List entry number: 1275008

Date first listed: 25-Sept-1951

Details: Tower and spire of Christ Church GV II Church tower. 1855. Messrs F and H Francis. Late C20 residential development attached to north and east is not of special interest. Rubblestone, ashlar dressings. Geometrical/Decorated Gothic style. Square plain. 3 main stages with paired bell louvres to third stage; corner buttresses and recessed spire to openwork parapet; linked to corner pinnacles by openwork flying buttresses. 3 stages of lucarnes to alternate faces. Included for group value only.

5) Bayswater Conservation Area

Date first designated: 09-Nov-1967

Appendix 2.0 Methodology

- 2.1 Historic England also provides relevant guidance in their 2019 document *Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12*. This document seeks to provide information on the analysis and assessment of heritage significance in line with the National Planning Policy Framework (NPPF), and thus relevant methodologies are applied across this Statement of Significance to appropriately and clearly assess interest across relevant heritage assets.
- 2.2 *Advice Note 12* sets out general advice on assessing significance of heritage assets. This can be summarised as follows:
1. Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits
 2. Understand the significance of the asset(s)
 3. Understand the impact of the proposal on that significance
 4. Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF
 5. Look for opportunities to better reveal or enhance significance
- 2.3 These five steps effectively fulfil the requirements of *paragraph 194* of the NPPF. Such a staged approach – whereby significance is assessed before a scheme is developed – effectively ensures proposals mitigate identified negative impacts upon significance, enhancing significance where possible, and thereby evidencing how any residual harm is justified.
- 2.4 Given this preferred staged approach set out above, *Advice Note 12* also provides a ‘*suggested structure for a statement of heritage significance*’. This structure – to be adapted and applied across this Heritage Impact Assessment – can be summarised as follows:
1. **Introduction**
 - a. Purpose
 - b. The nature of the proposals
 - c. Designation records for the heritage asset
 - d. Reference(s) in the local Historic Environment Record (where relevant)
 - e. Archaeological potential (where relevant)
 - f. Planning history
 - g. Consultations undertaken (where relevant)
 - h. Approach and methodology
 2. **The Heritage Asset and its Significance**
 - a. Understanding the form and history of a heritage asset – set out an understanding of the heritage asset following:
 - i. Familiarity with the asset itself, developed through visiting the site, carrying out, where necessary, documentary research, architectural historic and archaeological investigation, including, where necessary, fabric and comparative analysis, desk-based assessment and, if necessary, a field evaluation;
 - ii. Compilation of photographs (both historic and present); elevations; historic drawings; etc of the heritage asset
 - iii. An understanding of the proposals, directed towards those matters crucial in terms of the changes proposed, and therefore the impact on significance
 - iv. In the development of proposals, investigative works may be carried out which increase the understanding of the heritage asset, such further understanding may usefully be noted here.
 3. **Assess the Significance of the Heritage Asset – Table 1**
 - a. For each heritage asset, describe the following interests:
 - i. Archaeological interest – there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point;
 - ii. Architectural and artistic interest – there are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, such as sculpture;
 - iii. Historic interest – An interest in past lives and events, heritage assets can illustrate or be associated with them. Heritage assets with historic interest provide a material record of historic but also a meaning for communities derived from their collective experience of a place.

b. Assess the level of the general significance of the heritage asset and the particular contribution to that significance of any features which would be affected by the proposal.

4. **Impact on the Significance – Table 2**

- a. Where the proposal affects the historic fabric of the heritage asset, specify the effect on that fabric including loss or concealment of historic features and fabric which contribute to significance – both internally and externally, proposed removals and demolitions and the impact of alterations and extensions, where proposed etc;
- b. In some cases, condition and structural surveys may usefully be quoted as a means of explaining why a particular course of action has been chosen.
- c. Where the proposal affects the setting, and related views, of a heritage asset, or assets, clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated. This may include the impact of the location of new development within the setting, of the impact on key views, the impact on the relationship of the heritage asset to its setting, etc.
- d. Where the proposal impacts both on the heritage asset directly and on its setting, a cumulative assessment of impact will be needed. Impacts both harmful and beneficial should be noted.

5. **Avoid Harmful Impact(s) – Table 3**

- a. The NPPF stresses that impacts on heritage assets should be avoided. Therefore, show how the impact is to be avoided or minimised, for instance by the proposal being reversible.
- b. In some circumstances, the ability to appreciate significance may be enhanced or otherwise revealed by the proposal; this should be outlined here.
- c. As this may be a matter of the way the proposal has been designed, reference in the Design and Access Statement (where appropriate) is likely to be useful.

6. **Justification for Harmful Impacts – Table 4**

- a. This is the opportunity to describe the justification for the proposals.

7. **Recording**

- a. Where there would be an impact on the significance of the heritage asset, any further archaeological analysis and recording proposed should be detailed.

8. **Summary**

- a. Succinct explanation of the impact of the proposal on significance of heritage asset(s) and how impact on significance, both positive and negative, has been avoided, by continuing to follow the staged approach - impact on the significance, avoid harmful impact(s), justification for harmful impacts, need for recording
- b. A clear and succinct explanation of the effect of the proposal on significance of the heritage asset, and how any harm to its significance has been avoided and/or mitigated, can be helpful, as a summary of the proposal.

2.5 Stages 3 to 6 are supported by the following tables:

Table 1: Significance of the Heritage Asset

Level of Sensitivity	Designation Status
Very High	International heritage assets of outstanding universal value which fulfil the criteria for inclusion on the UNESCO World Heritage List.
High	Heritage assets of exceptional interest, and fulfil the criteria for designation at a high grade including Scheduled Monuments, Listed Buildings of Grade I or II* designation, Registered Battlefields, Registered Historic Parks and Gardens, which are considered to be nationally important.
Medium	Heritage assets of special interest that fulfil the criteria for listing and / or designation otherwise including Grade II listed buildings / Registered Park and Garden, Registered Battlefield or Protected Wreck Site or Conservation Areas. Regionally important archaeological features and areas (as defined in the Historic Environment Record).
Low	Heritage assets of moderate interest that fulfil the criteria for local listing as set out by local authority guidance or Historic England's advice note on Local Listing (2016b). Broadly defined, such assets possess architectural or historical interest that notably contributes to local distinctiveness or possesses archaeological interest that greatly contributes towards the objectives of a regional research agenda. This can include a non-designated heritage asset.
Very Low / Negligible	Sites and features noted as locally important. Other, non-designated features of cultural heritage significance. Badly preserved / damaged or very common archaeological features / buildings of little or no value at local or other scale.

Table 2: Impact on Significance

Impact on Significance	Description
High	The application site and / or element is fundamental to the key interest/s that define the significance of the asset, and of potential high or very high significance in its own right.
Medium	The application site and / or element makes an important contribution to the significance of the asset, comprising a feature of medium significance that have been affected by loss and erosion of the baseline situation.
Low	The application site and / or element makes a slight contribution to the significance of the asset, comprising a low significance and has been subject to substantial loss and erosion of baseline situation.
Neutral	The application site and / or element does not contribute to the significance of the asset.
Negative	The application site and / or element represents negative impingement which detracts from the significance of the asset.
Uncertain	Impact uncertain, more information required.

Table 3 – Avoiding Impacts

Impacts	Description
Very Positive	Following implementation and establishment of the site, the scheme will significantly better reveal, preserve or enhance the contribution the application site makes to the significance of the heritage asset and/or setting, and / or substantially contribute to the conservation of the asset.
Positive	Following implementation and establishment of the site, the scheme will better reveal, preserve or enhance the contribution the application site makes to the significance of the heritage asset and/or its setting, and / or contribution towards the conservation of the asset.
Neutral	Following implementation and establishment of the site, the scheme will preserve the contribution the application site makes towards the significance of the heritage asset and/or its setting.
Negative	Following implementation and establishment of the site, the scheme will result in the partial loss of the contribution the application site makes to the significance of the heritage asset and / or its setting, and / or will have a detrimental impact upon the conservation, preservation or enhancement of the asset.
Very Negative	Following implementation and establishment of the site, the scheme will result in the total loss of the contribution the application site makes to the significance of the heritage asset and / or its setting, and will have a significant detrimental impact upon the conservation of the heritage asset.
Uncertain	Impact uncertain, more information required.

Table 4 – Justification of Impacts

Classification	Description
Substantial Harm	The proposed change will seriously negatively alter, damage or result in significant loss to the historic and/or original fabric / setting / character and appearance, severely impacting upon the way in which the heritage asset is appreciated.
Less Than Substantial Harm	The proposed change will slightly alter, damage or result in minor loss to the historic and/or original fabric / setting / character and appearance, marginally impacting upon the way in which the heritage asset is appreciated.
No Harm / Negligible	The proposed change will cause no harm to the significance of the heritage asset, or its setting. Change will not alter the current understanding and/or significance or enhance this.
Benefit	Change will improve the current understanding of significance and how this is appreciated. Change will preserve or enhance the significance of the heritage asset.

- 2.6 Here it is pertinent to note that *Advice Note 12* states that 'the level of detail in a statement of heritage significance should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposals on their significance'. Thus, this document sets out the individual significance of buildings pertinent to the application site.

