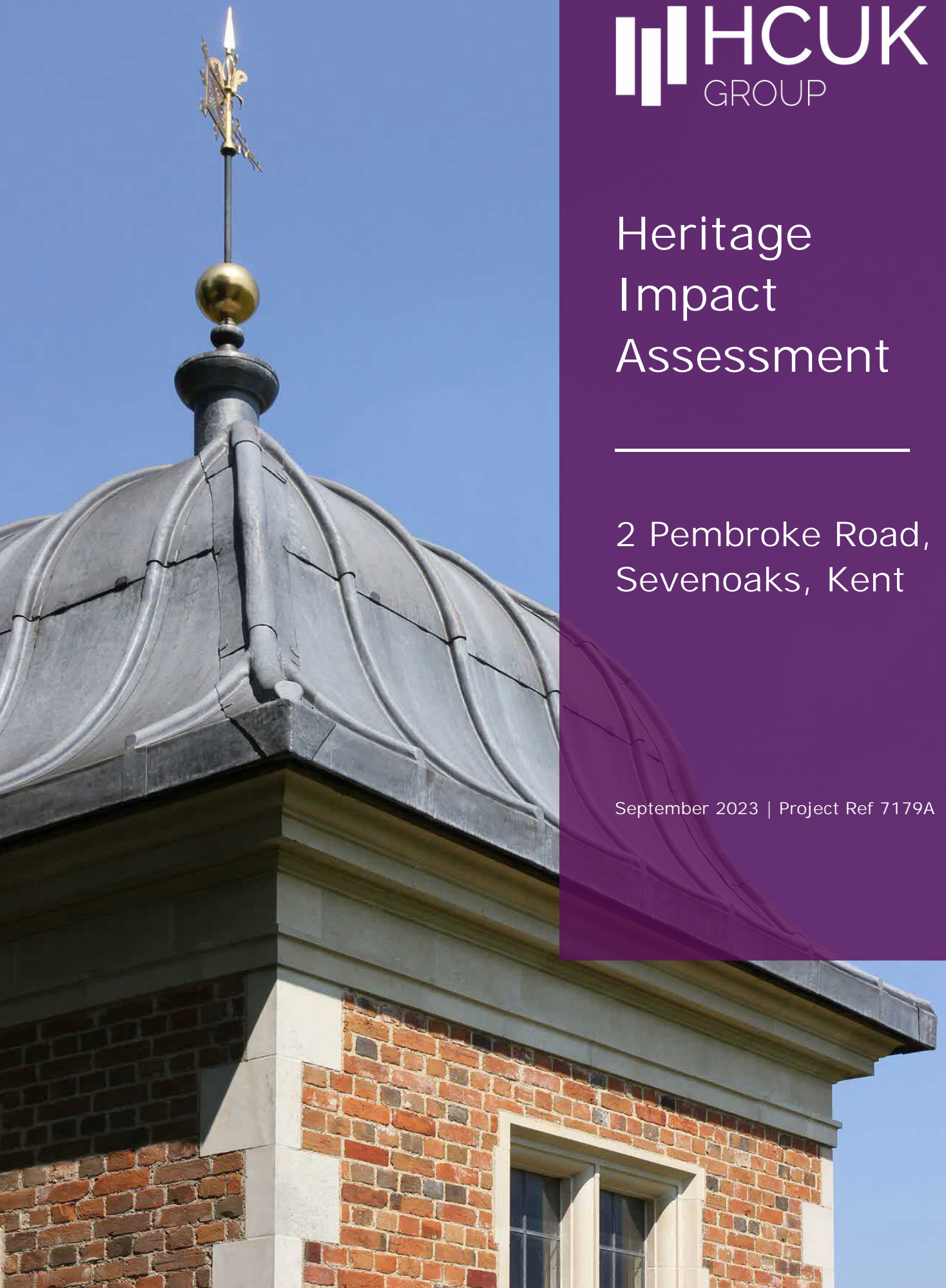




Heritage Impact Assessment

2 Pembroke Road,
Sevenoaks, Kent

September 2023 | Project Ref 7179A





Project Number: 7179A

File Origin: [https://heritagecollectiveuk.sharepoint.com/sites/7001-7500/Shared Documents/7101-7200/07179 - 2 Pembroke Rd, Sevenoaks/HC/Reports/2023.09.25 2 Pembroke Place Heriatge Impact Assessment_Final.docx](https://heritagecollectiveuk.sharepoint.com/sites/7001-7500/Shared%20Documents/7101-7200/07179%20-%202%20Pembroke%20Rd,%20Sevenoaks/HC/Reports/2023.09.25%202%20Pembroke%20Place%20Heriatge%20Impact%20Assessment_Final.docx)

No text or imagery within this report has been generated by Artificial Intelligence (AI).

Contents

1.	Introduction	1
2.	Relevant Planning Policy Framework.....	6
3.	Background and Development	8
4.	Statement of Significance.....	12
5.	Heritage Impact Assessment.....	17
6.	Conclusions	26

1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Wetton Cleaning Services Ltd. It relates to an application for a mixed use refurbishment and extension of 2 Pembroke Road, Sevenoaks. Sevenoaks District Council (SDC hereafter) are the determining authority.

1.2 The application site comprises 2 Pembroke Road a large detached building influenced by the Arts and Crafts Movement which dates from 1900. It was constructed as a single family dwelling but, after a number of different uses, has been in office use since the 1980s. While there are no designated heritage assets either within the site or its surroundings, 2 Pembroke Road has been included on SDC's local list meaning that it is treated as a locally listed building or non-designated heritage asset.



Figure 1: 2 Pembroke Road, the application site

- 1.3 In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2021) this statement describes the significance of the identified heritage assets.



Figure 2: Site location plan

The Proposals and Relevant Background

- 1.4 The proposed development relates to the conversion and extension of 2 Pembroke Road to provide a mixed use scheme comprising, the use of the basement level for plant and storage, 3x one bedroom flats and 5x two bedroom located within the existing building, 3x commercial units located within the proposed extension, and landscaping works to the grounds.

- 1.5 Physical alterations to the building to facilitate the scheme can be summarised as:

The introduction of a contemporary three storey extension to the building's west elevation (replacing an existing single storey modern addition);

The introduction of a new roof structure over the modern flat roofed extension to the building's eastern elevation;

Introduction of new dormer windows to the roof structure; and

Reworking of a rear bay window.

1.6 The proposals have been informed by pre-application discussions with the Council (LPA ref: PA/23/00095) and on a thorough understanding of the significance of 2 Pembroke Road as a non-designated heritage asset and seek to sensitively convert and extend this building while preserving if not enhancing the structure's unique heritage values.

1.7 There are a number of other heritage assets in the vicinity of the site including the Sevenoaks High Street Conservation Area, the Sevenoaks The Vine Conservation Area, Cornwall Hall (locally listed) and the Methodist Church (locally listed). While spatially relatively close to these assets, the application site is well removed from them by virtue of intervening built form and modern infrastructure associated with the crossroads. In addition, there are no known associative links between these assets and the application site aside. On this basis, changes on the application site are not found to be capable of affecting the significance of these assets which are out of this assessment. This accords with the pre-application advice received which did not raise nearby heritage assets.

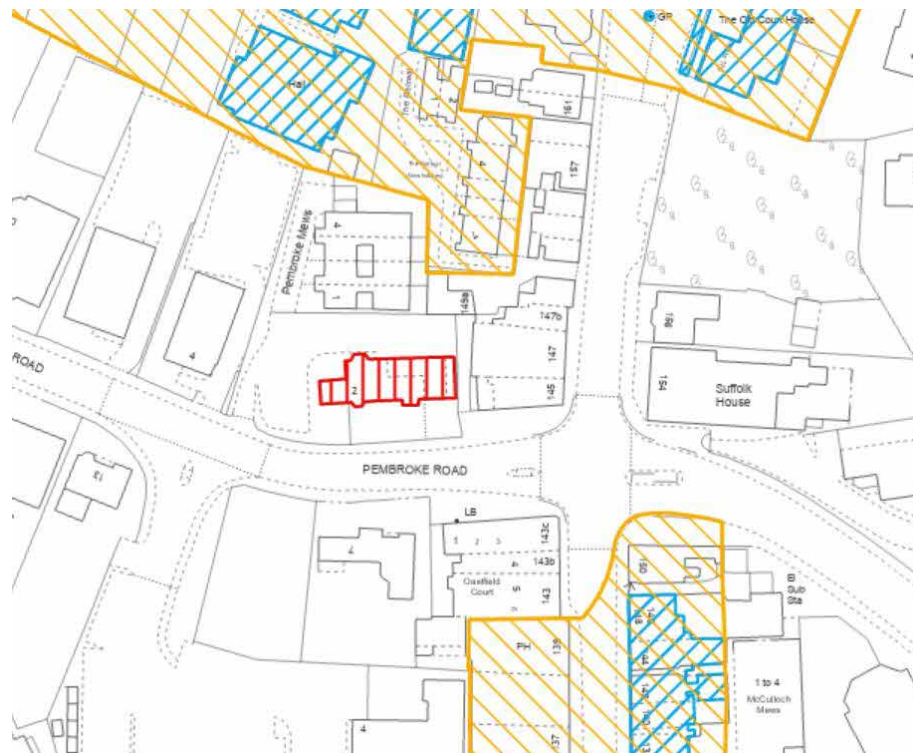


Figure 3: Conservation areas (orange) and locally listed buildings (blue) in the vicinity of the application site

- 1.8 While not shown on the Historic England map (likely due to a geo-referencing error) to the rear of the site is the grade II listed Retreat Almshouses (UID: 1086006, first designated September 1972). As with the other assets identified above, while relatively close to the site, the listed building is removed experientially and visually from 2 Pembroke Road due to intervening built form. In addition, the area of most change on the site (i.e. the western extension) is further removed from the listed building so to not lead to any change the setting of the asset capable of affecting its significance. As such, as with the other assets identified above, the listed building has been scoped out of this assessment.



Figure 4: Plan showing the location of the grade II listed Retreat Almshouses

Purpose of this Assessment

- 1.9 The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment. Value judgements on the significance of the identified heritage assets is presented and the effects of the

proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the National Planning Policy Framework (NPPF) 2021 and local planning policy. The site and heritage assets affected have been observed and assessed following a site visit made by the author in July 2023.

2. Relevant Planning Policy Framework

2.1 For the purposes of this statement, preservation equates to an absence of harm.¹ Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.²

2.1 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.2 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

2.3 Local Planning Policy for Sevenoaks is contained within the Core Strategy (adopted February 2011) and Allocations and Development Management Plan (adopted February 2015). In addition to the above, the Sevenoaks Town Neighbourhood Plan is now formally 'made'. Relevant policies and objectives from these documents are discussed below.

2.4 Policy SP1 Design of New Development and Conservation: This policy notes that all new development should be designed to a high quality and should respond to local character. It notes that new development should create safe, inclusive and attractive environments that meet the needs of users, incorporate principles of

¹ South Lakeland v SSE [1992] 2 AC 141.

² Conservation Principles, 2008, paragraph 84.

sustainable development and maintain and enhance biodiversity. With regards to heritage assets, the policy notes that heritage assets and their settings (including “listed buildings, conservation areas, archaeological remains, ancient monuments, historic parks and gardens, historic buildings, landscapes and outstanding views”) will be protected and enhanced.

2.5 Policy EN1 Design Principles: This policy notes that proposals which would create high quality design and meet certain criteria (A-H within the policy) will be permitted.

2.6 Policy EN4 Heritage Assets: This policy concludes that proposals that affect a heritage asset or its setting will be permitted where the development conserves the character, appearance and setting of the asset. It notes that applications will be assessed with reference to the historic and/or architectural interest of the asset, the prominence of its location and setting and the significance of any elements to be lost or replaced.

2.7 Sevenoaks Town Neighbourhood Plan Policy C1: This policy notes that the Neighbourhood Plan will support developments that sustain, or where practicable, enhance the significance of a heritage asset, or the contribution made by its setting. It goes on to note that new development must be designed to preserve, and where possible, enhance the character or appearance of a conservation area.

3. Background and Development

- 3.1 As noted in the Introduction, 2 Pembroke Road dates to 1900. Prior to the end of the 19th century, this part of Sevenoaks was on the outskirts of the town and marked a transition between the town centre and rural surroundings. At this time, prior to the construction of Pembroke Road itself, the application site formed part of the farmland associated with Bedlam Farm (now the grade II listed The Oak Public House) and areas of rear gardens of a series of buildings labelled as 'Manor Place'. The 1870 Town Map (Figure 5) shows the area at this time. The first edition Ordnance Survey Map from 1871 and 1898 Ordnance Survey Map (both not replicated here) show a similar arrangement.



Figure 5: 1870 Sevenoaks Town Map (surveyed 1868). Reproduced with permission of the National Library of Scotland

- 3.2 The first map to show 2 Pembroke Road (and indeed the road itself) is the 1909 Ordnance Survey Map (Figure 6). This suggests that Pembroke Road was established at some point between 1898 and 1900 and that 2 Pembroke Road, also known as Estate House, was one of the first buildings erected on the road.
- 3.3 At the time of this map, the transitional character of the area can still be seen with land to the south of Pembroke Road predominantly undeveloped and historic agricultural buildings associated with the former Bedlam Farm (for example the oast house immediately south of the application site) still remaining in place.



Figure 6: 1909 Ordnance Survey Map (surveyed 1907). Reproduced with permission of the National Library of Scotland

3.4

By the time of the 1941 Ordnance Survey Map (Figure 7) far greater levels of development are present around the application site including the introduction of new housing lining the southern side of Pembroke Road.



Figure 7: 1941 Ordnance Survey Map (surveyed 1937). Reproduced with permission of the National Library of Scotland

3.5

Both of these maps show that the footprint of 2 Pembroke Road remains consistent during the first half of the twentieth century. It is not until later in the 20th century

that the single storey western extension is added and then in c.2015 when the two storey eastern extension is constructed (LPA ref: 15/03245/FUL). At this time the building underwent a notable refurbishment which included the replacement of all but one original window.

- 3.6** As noted in the Introduction, the building was originally designed as a detached single family dwelling. There are no confirmed Census entries for 1901 showing 2 Pembroke Road, however, there is only one entry for Pembroke Road on this Census which relates to an Anne Parker, 62, living on her own means as the head of a household with her sister and a number of staff and given the early date of construction of Estate House it may be that this entry relates to the application site.
- 3.7** No entry can be found on the 1911 Census but by the time of the 1939 Register the building is occupied by Bartholomew Foskett and his family. Bartholomew Foskett is listed as a solicitor and it may well be that he was practising from 2 Pembroke Road, marking the start of the building's conversion from residential to commercial use.
- 3.8** Newspapers from the 1940s show that by 1949 the building was functioning as the premises for Charles Hodgins & Sons, a firm of estate agents, auctioneers, surveyors and valuers. It may be at this time that the building first became known as 'Estate House' as no records prior to this date indicate that name in use.

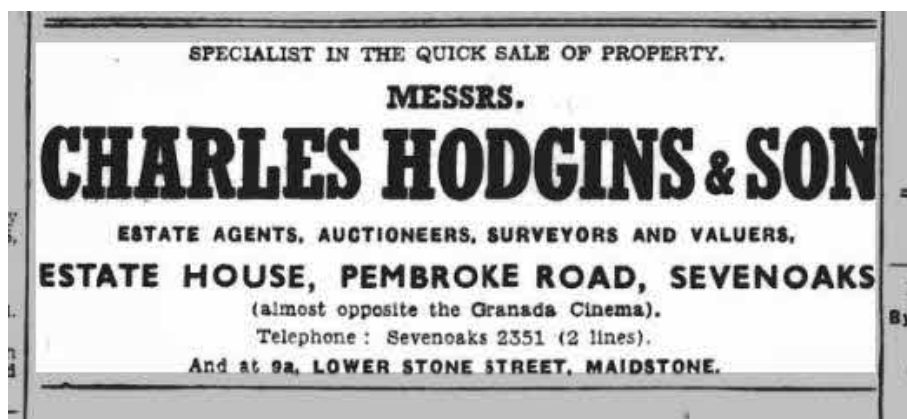


Figure 8: Extract from the Sevenoaks Chronicle and Kentish Advertiser, Friday 2nd September 1949. Image sourced from British Newspaper Archive

- 3.9** The building went through a number of other uses over the course of the 20th century including as a doctors' surgery (with some live in accommodation). In 1988

consent was granted from the conversion of the building from this use to an office (LPA ref: 88/01017/HIST). Estate House remains in office use today.

3.10 In the 1990s the former rear garden associated with Estate House was sold and a development of single storey dwellings on the site was created.

4. Statement of Significance

Assessment of Significance

- 4.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF. In accordance with paragraph 194 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 4.2 It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected is therefore fundamental to understanding the scope for and acceptability of change.

Estate House, 2 Pembroke Road (NDHA)

- 4.3 As identified, 2 Pembroke Road has been added to SDC's Local List meaning the building is treated as a locally listed structure and non-designated heritage asset).
- 4.4 The building's List Entry reads:

Asset ID: 10296

Description: Estate House is a large Arts and Craft detached house, dated 1900 over doorway, now used as office by Solicitors. The whole building is red brick with fancy tile-hanging to first floor and steep-pitched tiled roof; some chimneys survive. Front features a wide gabled, jettied wing, carried on brackets over large m & t window. Asymmetrical two-light mullioned windows either side of wide three-centred arched doorway. The windows are casement and most are original. To the front the building has three different bay windows, one with original

stained glass, the frame of which appears to be rusting. Another bay is square fronted, extending to the roof, and the third is ground floor only. Other windows are lead lighted, and the door way has an original porch arch, with original porch tiles. To the rear is a large bay window, extending to the roof, with unusual roof finial on. The property's garden has been paved with red brick and crazy paving. There are two extensions to the property, a single storey building with flat roof to the left, and two storey to the right, with ridge tiled roof and the second storey hung with red clay tiles.

Asset Type: Commercial building

Conservation Area: Not in any conservation area

Selection Criteria: 3 Built 1900-1919 (early C20th). Retains original features. Quality distinguishes it from other buildings of the period in Sevenoaks. 11 Exhibits important characteristics of design, decoration, craftsmanship or use of materials. 18 Building or group of buildings that contributes significantly to the townscape, street scene or appearance of the area.

4.5 As noted above the list entry references three of SDC’s selection criteria as reasons for its identification as a non-designated heritage asset. These criteria, alongside the building’s heritage value, are explored in more detail in the table below.

Selection Criteria	Assessment of 2 Pembroke Road
3. If it was built between 1900-1919 (early 20th century), does it retain its original features? Is it of sufficient quality to distinguish it from other buildings of that period locally?	While altered and extended, the building does retain a good level of original features including its original entrance porch with tiles, a single leaded light, decorative tile hanging, bay windows, barge boards and chimneys. As such, the building retains sufficient character and detailing to distinguish it from other buildings locally. However, the changes made to the building have been unsympathetic and include the loss of all original windows (bar one

	<p>leaded light) and the introduction of two out of keeping flat roofed extension. These alterations have affected and eroded the architectural interest of the building and its authenticity and integrity as a surviving former dwelling influenced by the Arts and Crafts movement.</p>
<p>11. Does the building or structure exhibit important characteristics of design, decoration or craftsmanship? For example, a mural, or clock or decorative tile work on an otherwise undistinguished building</p>	<p>Yes, the building does demonstrate the use of high quality materials and detailing which are characteristic of architecture influenced by the Arts and Crafts Movement.</p>
<p>18. Does the building or group of buildings contribute significantly to the townscape, street scene or appearance of the area?</p>	<p>For the reasons identified above, the building does make a positive contribution to the area’s street scene and character. However, it does not possess any particular group or landmark value.</p>



Figures 9 and 10: Front elevation of 2 Pembroke Road



Figures 11 and 12: Rear and western side elevation of 2 Pembroke Road



Figures 13 and 14: Modern and unsympathetic extension present to the western (left) and eastern (right) elevations of 2 Pembroke Road

4.6 Non-designated heritage assets are defined by paragraph 039 of the PPG (Reference ID: 18a-039-20190723) as:

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

4.7 The same paragraph goes onto note that:

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.

4.8 As such, it is clear that non-designated heritage assets are not common and that, even where a building could lay claim to a little heritage significance, that does not mean that it should be considered a non-designated heritage asset.

4.9 In this case, the modern extensions to 2 Pembroke Road are of no heritage value and these additions (alongside the replacement of almost all of the original windows) have eroded the heritage value of the building. However, despite these changes, the building retains a good degree of original features and detailing and is a characterful example of a large turn of the century Arts and Crafts Movement influenced dwelling which is found to be of a local level of architectural and historic interest.

4.10 The setting of the locally listed building has been significantly changed as a result of the construction of houses on the former gardens of the building (to the north) and modern redevelopment in the wider area. However, the building's relationship with Pembroke Road, which Estate House directly addresses, is a positive one and the generally green front garden area of the building provide an attractive foreground to the structure in views from the surrounding area.

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter. This chapter should be read in conjunction with the preceding chapter, and the drawn submission of the application.

Proposed Development

5.2 As identified in the Introduction, the proposals relate to the conversion of 2 Pembroke Road from an office into a mixed use development comprising 3x commercial units, 8x residential units and plant and storage within the existing basement. Physical alterations to the building can be summarised as:

The demolition of the existing single storey modern extension to the building's western elevation and, in its place, the introduction of a contemporary three storey addition;

The introduction of a habitable new roof structure over the existing modern flat roofed extension to the building's eastern elevation;

Introduction of new dormer windows to the roof structure (front and rear);

Reworking of a rear bay window; and

Landscaping works to the grounds.



Figure 15: Proposed front elevation of 2 Pembroke Road



Figure 16: Proposed rear elevation of 2 Pembroke Road

Impact Assessment

- 5.3** Prior to turning to physical alterations proposed, it is relevant to consider the proposed change of use of 2 Pembroke Road. While three commercial units are proposed as part of the development, these would be housed within the modern extension proposed to the building's western end meaning the entirety of the historic structure would be converted to residential use. While historically the building functioned as a single family dwelling, reinstating a residential use to the locally listed building is entirely in keeping with its character, historic and significance. In addition to reinstating the original residential use (though no longer as a single family dwelling), the proposed use would see for the long term conservation and maintenance of the locally listed building. In this sense, the change of use is a positive one.
- 5.4** As identified in the preceding section, the existing western single storey extension likely dates from the late 20th or early 21st century. While constructed of an in keeping red brick, the extension is unsympathetic to the character and appearance of the locally listed building due to the lack of detailing present and flat roof nature of the extension. As such, it does not contribute to or better reveal the significance of the locally listed building and could be considered to be a negative addition.
- 5.5** On this basis, the demolition of this extension would not cause any harm to the significance of the locally listed building and offers a clear opportunity for architectural enhancements on the site.



Figures 17 and 18: Existing single storey extension to the building western elevation

5.6

Proposals also seek to remove the remnants of the two bay windows present to the building's western elevation at ground floor level. Reference to historic mapping (specifically **Figures 6 and 7**) demonstrate that the southern most bay window was likely present at the time of the building's construction having been present by the time of the 1909 Ordnance Survey Map. This bay window has now been almost entirely lost as a result of the single storey extension which has included the partial reconstruction of the southern face of the former bay (**Figure 18**) which is now constructed from the same modern brickwork as the extension itself. The northern bay window is not shown on this historic mapping demonstrating that it is a later addition, dating from post 1941. Given the modern nature of this bay window and the high level of loss to the original bay window, the removal of these features is not found to result in any harm to or effect on the significance of 2 Pembroke Road as a locally listed building.

5.7

Following on from the demolition of this part of the existing building, proposals entail the construction of a three storey extension which would house the three commercial units proposed.

5.8

The extension has been designed to be of an overt contemporary appearance with a modest massing which remains of a limited width and clearly lower than the building's ridgeline. As a result, the extension is appreciated as an honestly modern addition to the historic building which is clearly subservient to the historic structure. Changes to the design of the structure have been made since the earlier pre-application stage which include architectural and material changes. These changes

have overcome earlier officer concern regarding the potentially “visually obtrusive” nature of the extension.

5.9 In terms of the proposed materials, the use of high-quality red brick to the ground floor and use of diamond patterned Corten steel cladding to the upper floors is effective and ensures a positive relationship between the historic and new, maintaining an in keeping and consistent colour palette. In particular the use of the Corten steel ‘shingles’ emulates visually the tile hung aspects of Estate House.

5.10 The proposed extension is also set back off the historic building by a two storey glazed link. In accordance with the pre-application advice, this glazed link is set back from the face of Estate House allowing it to be appreciated as a recessive element ensuring that “it does not become a strident or distracting element in the principal elevation”.

5.11 Overall, while introducing a large new element of built form on to the site, the proposed extension has been carefully considered in terms of siting, massing, scale, detailing and materials to relate positively to Estate House. The extension would not be prominent or dominate the locally listed building in views along Pembroke Road (for example it would be predominantly concealed by tree planting in views from the west and by built form in views from the east) and be instantly appreciable as a modern addition to the earlier building. There is a long-standing tradition of providing high quality contemporary architecture in historic areas and in this sense, the proposed extension would provide a positive juxtaposition against Estate House and would contribute to the area’s rich and varied streetscape.

5.12 At pre-application stage, with regards to the proposed three storey extension, officers noted that:

It is not yet known how the proposed works would resolve the junctions with the existing gabled side elevations of the locally-listed building, which feature characterful fancy tile-hanging and chimney stacks.

5.13 In response to this, the following key points are noted:

All existing chimneys will be retained externally.

Any existing tiles that may need to be removed as a result of the proposals would be carefully take down, cleaned and re-used elsewhere on the site.

The use of the two storey glazed link would ensure that the new extension is visually separate from the historic building and ensure that the western gable end of Estate House would remain visible.

- 5.14** To the eastern end of the locally listed building is a modern (c. 2015) extension which has a flat roof with glazed handrails, currently used as a roof terrace (Figure 19). While generally in keeping with the character and form of the building, the flat roof and glazed handrails are unsympathetic and incongruous features. Proposals seek to remove this roof terrace and introduce a new pitched roof above the retained extension which would provide another level of accommodation with dormer windows to the front and a gable to the rear.
- 5.15** These changes are wholly positive in respect to the architectural interest of the locally listed building, replacing the currently out of keeping feature with a traditionally influenced roof structure which remains subservient to the host building (due to its lowered ridge height) and successfully integrates the modern extension while ensuring that the historic elements of Estate House remain legible.



Figure 19: Modern eastern extension with flat roof and open sided ground floor

5.16 Another change to this modern part of the building is the infilling of the currently open ground floor area (**Figure 19**). While a minor change, this is a positive alteration providing a more coherent and residential character to this part of the building.

5.17 While not necessarily a contributor to significance, it is relevant to note that the changes to this part of the building would have no effect on visibility to the spire of the locally listed church which is glimpsed in a gap between 2 Pembroke Road and its neighbour to the east (**Figures 19 and 20**).



Figure 20: View of Estate House with the spire of the locally listed church to the right hand side

5.18 To the roof of the main historic part of the application site, proposals involve the introduction of a new dormer window to the front elevation (far left) and the replacement of two flat roofed rear dormers with dormer windows which match those already present to the front (**Figures 21 and 22**).

5.19 While some existing roof fabric would be removed to facilitate these changes, the proposals would be wholly in keeping with the character and appearance of Estate

House and its architecture. The replacement of the dormer windows to the rear elevation would represent a slight architectural enhancement given the way the existing flat topped dormers present in this location are not overtly in keeping with the character of the wider building.



Figures 21 and 22: Front elevation existing dormers and location of new proposed dormer (left) and rear elevation flat roofed dormers proposed for replacement

5.20 The final physical alteration to the building relates to the re-working of the rear projecting bay. This feature is currently a two storey bay window with a pyramidal roof and finial. In order to provide more function space within the roof structure proposals seek to re-work this bay window so that it also serves the second floor accommodation. The proposed dormer would relate architecturally to existing dormers on the front elevation of the building being constructed from red brick at ground floor, tile hanging to the first floor and a combination of pebbledash and applied timber boarding to the projecting gable end. The existing decorative finial which sits atop the bay window roof would be retained and reinstated at the apex of the gable. While resulting in the loss of part of the original building this is not a change which, overall, is found to result in any harm to the significance of the locally listed building. This is due to the bay window's relatively concealed location to the rear of the building, the loss of the bay window's original windows, the appropriate and in keeping character and materials of the replacement bay window and the retention and re-use of the existing decorative finial. Importantly, all other historic features and fabric associated with the locally listed building would be retained in situ.

5.21 Landscaping proposal seek to retain the generally green character of the site's frontage which is a positive aspect of the setting of the locally listed building. The

existing TPO remain unaffected and changes to hardstanding are minor and related to providing access to the commercial units and the dwelling's amenity areas. Where private spaces are demarked, this is undertaken through soft landscaping as opposed to fencing ensuring that the building maintains a positive relationship with this front garden area and that there would be no material change to views of the building from Pembroke Road. To the rear of the site the existing hardstanding and parking is retained.

Summary and Policy Compliance

- 5.22** The proposed development is based on an understanding of the character of 2 Pembroke Road, its historic development and significance and pre-application advice received from Sevenoaks District Council. The proposals have been carefully designed to enhance the appearance of the building while providing it with a long-term viable use (that will see for the conservation of the locally listed building) while being sensitive to, and where possible, enhancing the significance of the asset.
- 5.23** There are no statutory provisions (i.e., though legislation such as the Planning (LBCA) Act 1990) for non-designated heritage assets. As such, the primary consideration is Paragraph 203 of the NPPF. The policy tests set out for non-designated heritage assets are clearly more limited than those relating to designated heritage assets (including paragraphs 199-202 of the NPPF). All that is required by paragraph 203 in respect of non-designated heritage assets is that the effect of an application on the significance of that assets should be taken into account³. In full, this policy notes that:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

³ Travis Perkins (Properties) Ltd V Westminster City Council & Ors [2017] EWHC 2738 (Admin)

- 5.24 In determining applications affecting non-designated heritage assets, as established by case law⁴, paragraph 203 of the NPPF calls for consideration of any application as a whole with a balanced judgement to be made by the decision maker. The NPPF does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter.
- 5.25 In accordance with the assessment presented above the proposals are found to entirely preserve the significance of the locally listed building. While some historic fabric would be removed, the works secure a number of heritage benefits which enhance the significance of the building (i.e., the removal of unsympathetic modern additions and the introduction of an appropriate and in keeping roof to the modern eastern extension) which ensure that, overall, there would be a positive effect upon the asset's significance. In accordance with paragraph 203 of the NPPF, the effect of the application on the significance of the non-designated heritage asset has been taken into account. No harm for the purposes of paragraph 203 is identified.
- 5.26 As identified in the Introduction, while there are a number of other heritage assets in the vicinity of the application site, these are well removed from 2 Pembroke Road as a result of intervening built form and modern infrastructure associated with the crossroads. Neither the significance nor setting of these assets would be affected by the proposed development.

⁴ Dorothy Bohm & Ors v Secretary of State for Communities and Local Government & Ors [2017] EWHC 3217 (Admin)

6. Conclusions

6.1 This Heritage Impact Assessment presents an assessment of significance of Estate House, 2 Pembroke Road. This is followed by an appraisal of the effects of the proposals upon these heritage assets with consideration given to local and national policy and guidance.

6.2 2 Pembroke Road, Estate House, was constructed in 1900 as a single family dwelling in a style influenced by the Arts and Crafts Movement. While altered over time and now featuring a number of unsympathetic extensions, the building is of a local level of architectural and historic interest retaining a good degree of original features and detailing and a characterful example of its period.

6.3 Following on from pre-application discussions with SDC, the proposals include the conversion of 2 Pembroke Road from an office into a mixed use development comprising 3x commercial units, 8x residential units and plant and storage within the existing basement. Physical alterations to the building can be summarised as:

The demolition of the existing single storey modern extension to the building's western elevation and, in its place, the introduction of a contemporary three storey addition;

The introduction of a habitable new roof structure over the existing modern flat roofed extension to the building's eastern elevation;

Introduction of new dormer windows to the roof structure (front and rear);

Reworking of a rear bay window; and

Landscaping works to the grounds.

6.4 Section 5 of this report presents an assessment of the impact of the proposed works on the significance of the identified heritage assets and concludes that the proposals would entirely preserve the significance of the locally listed building and result in an overall positive effect upon the significance of the asset as a result of the numerous beneficial aspects of the scheme which include the reinstatement of a residential use, the removal of the poor quality single storey extension and the better integration of the modern two storey extension.

- 6.5 In summary, the proposed works to the locally listed building are considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. In accordance with paragraph 203 of the NPPF, the effect of the application on the significance of the non-designated heritage asset has been taken into account and no harm is identified.

Standard Sources

<https://maps.nls.uk>

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

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)