
35D RANDOLPH AVENUE, LONDON, W9 1BQ

Heritage Statement

Project Ref: FL12212

Written By: Josie Roscoe & Robert Kennedy

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hello@fullerlong.com

0808 164 1288

fullerlong.com



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1 INTRODUCTION

1.1 PROJECT BACKGROUND

- 1.1.1. Fuller Long has been commissioned by Caroline Lynn to produce a Heritage Statement (HS) in support of a listed building consent and planning application at 35D Randolph Avenue, London (hereafter referred to as the subject property). The subject property is located within the administrative boundary of the Westminster City Council.
- 1.1.2. The scheme is for internal and external alterations within the first floor level flat. This will include removals of later partitions and mezzanine, thus reinstating the front room footprint. A new bathroom and kitchen are proposed within the front room (with associated services to run the existing routes) and the suspended ceiling will be removed with a new one in place to better resemble the room's original height. Within the kitchen area will be a new electric combi boiler with flue. The front window which was altered as part of the conversion into flats will be reinstated and the existing French doors will be replaced with a slimline glazed unit with glazing bars to match the original window configuration. The glazing in the rear French window will be replaced with slimline glazing. New timber flooring is proposed throughout with tile in the bathroom pod. A new SVP will connect to the existing on the second floor and ground floor level.
- 1.1.3. For full details of the subject site and the proposed scheme, reference should be made to the plans and documents produced by Studio Fade.
- 1.1.4. The subject property is a statutorily grade II listed building situated in the Maide Vale Conservation Area. As such, this report has been produced to provide a significance assessment of the heritage assets that may be impacted by the development proposal. Professional expert opinion has been used to assess heritage significance, based on historic, archaeological, architectural or artistic interest, and the heritage values set out in Historic England Conservation Principles (2008). The report provides a heritage impact assessment of the contribution of setting to the significance of designated assets within the study area in line with The Planning (Listed Buildings and Conservation Areas) Act 1990, The National Planning Policy Framework (2023) (NPPF) and Local Plan policies. This HS does not address buried heritage assets (archaeological remains).
- 1.1.5. A site visit was conducted on the 8th of December 2022 by visual inspection to analyse the site and to ascertain whether the proposed works will affect the character and appearance of the Maida Vale Conservation Area. Consideration has been given to the features which contribute to the special interest of these designated and non-designated heritage assets and their settings.

1.2 AIMS AND OBJECTIVES

- 1.2.1. The aim of this Heritage Statement is to assess the impact of the scheme and to provide a suitable strategy to mitigate any adverse effects, if required, as part of a planning application. The aim is achieved through six objectives:
- identify the presence of any known or potential heritage asset that may be affected by the scheme;
 - describe the significance of such assets, in accordance with the National Planning Policy Framework (NPPF), taking into account factors which may have compromised an asset's survival or significance;

- determine the contribution to which setting makes to the significance of any sensitive (i.e. designated) heritage assets;
- assess the impacts upon the significance of the asset(s) arising from the scheme,
- assess the impact of the proposed scheme on how designated heritage assets are understood and experienced through changes to their setting; and
- provide recommendations for further investigation and/or mitigation where required, aimed at reducing or removing any adverse effects.

2 METHODOLOGY AND SOURCES

2.1.1. This HS has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (MHCLG 2023) and to standards and guidance produced by Historic England (HE), the Institute of Historic Buildings Conservation (IHBC), and the Chartered Institute for Archaeologists (CIfA). The British Standard: Guide to the Conservation of Historic Buildings 7913:2013 (BS 2013) has also been used to inform this HS.

2.1.2. In addition to the above, the scheme will be assessed in relation to its compliance with the following principal sources:

- The Planning (Listed Building and Conservation Areas) Act 1990
- National Planning Policy Framework (NPPF), 2023
- Planning Practice Guidance (PPG)
- Conservation principles, policies and guidance for the sustainable management of the historic environment, Historic England, April 2008
- Historic Environment Good Practice Advice in Planning, Historic England, March 2015:
 - Planning Note 1: The Historic Environment in Local Plans
 - Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
 - Planning Note 3: The Setting of Heritage Assets
- The London Plan (2021)
- Local Planning Policy and Guidance

2.1.3. The table below provides a summary of the key data sources used to inform the production of this HS. Occasionally there may be reference to assets beyond the study site or surrounding study area, where appropriate, e.g., where such assets are particularly significant and/or where they contribute to current understanding of the historic environment.

2.1.4. Table 1 - Summary of data sources

Source	Data	Comment
Historic England	National Heritage List (NHL) with information on statutorily designated heritage assets	Statutory designations (scheduled monuments; statutorily listed buildings; registered parks and gardens; historic battlefields) can provide a significant constraint to development.
Local Planning Authority	Conservation area supporting documents	An area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.

Ordnance Survey mapping	Ordnance Survey maps from the 1st edition (1860–70s) to present day.	Provides an indication of the development of settlements/ landscape through time as well as the possible date of any buildings on the site. Provides a good indication of past land use, the potential for archaeology and impacts which may have compromised archaeological survival.
Internet	Web-published local history; Archaeological Data Service	Many key documentary sources, such as the Victoria County History, the Survey of London, and local and specialist studies are now published on the web and can be used to inform the archaeological and historical background. The Archaeological Data Service includes an archive of digital fieldwork reports. Local History Societies online published material.
The client	Planning data	Drawings of the existing and proposed.

2.2 DEFINITION OF HARM

- 2.2.1. Current guidance by Historic England is that 'change' does not equate to 'harm'. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – substantial and less than substantial. Paragraph 201 of the NPPF states that:
- 2.2.2. 'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss...'
- 2.2.3. Paragraph 202 of the NPPF states that:
- 2.2.4. 'Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals...'
- 2.2.5. In determining the effects of the Proposed Scheme this heritage statement is cognisant of case law. Including the below:
- Flag Station, Mansel Lacy, Herefordshire [22/09/2015] Case Number EWHC 2688
- 2.2.6. This ruling has emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to 'have special regard to the desirability of preserving the [listed] building or its setting'. As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding the impact on the setting of a listed building:

- 2.2.7. 'It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.'
- PALMER Appellant and Herefordshire Council and ANR [04/11/16] Case No: C1/2015/3383
- 2.2.8. The judgment was agreed by Lord Justice Lewison at the Court of Appeal, who stated that:
- 2.2.9. 'It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused.'
- 2.2.10. In line with the above, this HS will make an assessment of the significance of the heritage asset(s) subject to a potential effect due to the proposed scheme. This assessment will identify and set out the principal heritage values that contribute to the significance of the subject property/ site, and, where relevant, heritage assets beyond the subject property/ site.
- 2.2.11. The relative contribution of the heritage values to the significance of the asset(s) are graded as either high, medium, low, neutral or detrimental.

3 THE SUBJECT PROPERTY AND SITE

3.1 LOCATION AND CONTEXT

- 3.1.1. The subject property is located to the northwest of the City of Westminster on the south side of Randolph Avenue: a terraced street 1km north of Paddington Train Station. It is in the Maida Vale Conservation Area.
- 3.1.2. The built form comprises substantial 19th century terraced townhouses, many of which have been subdivided into flats. Properties are tall, generally four to five storeys in height over semi-basements. A continuous and unbroken building line is a prominent feature, particularly along Randolph Avenue. Buildings step back from the road with generous forecourts and rear gardens, which can be glimpsed from side gaps. The material palette mainly comprises brick, stucco, timber and cast iron. Roofs are typically clad in slate, hipped or butterfly hidden behind parapets. Boundary treatments display great uniformity with predominance of cast iron railings. Many neighbouring properties are statutorily listed and/or possess notable degree of architectural interest.
- 3.1.3. The predominant land use of the area is residential with local commercial activities in Clifton Road, Formosa Street and Elgin Avenue.

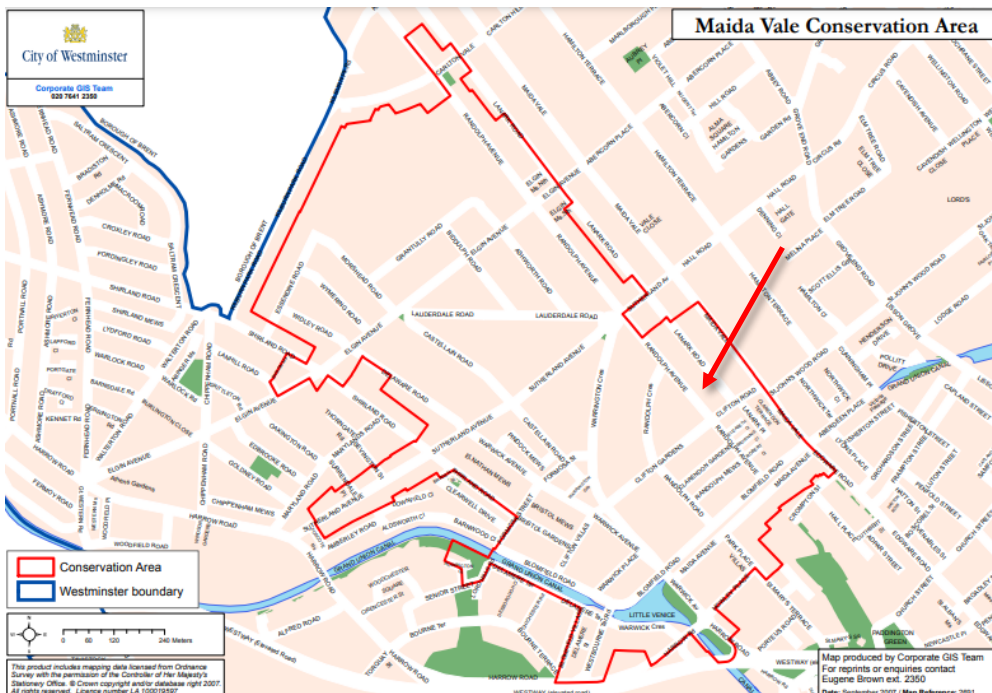


Figure 1: Maida Vale Conservation Area (Westminster City Council). The subject property is marked by a red arrow.

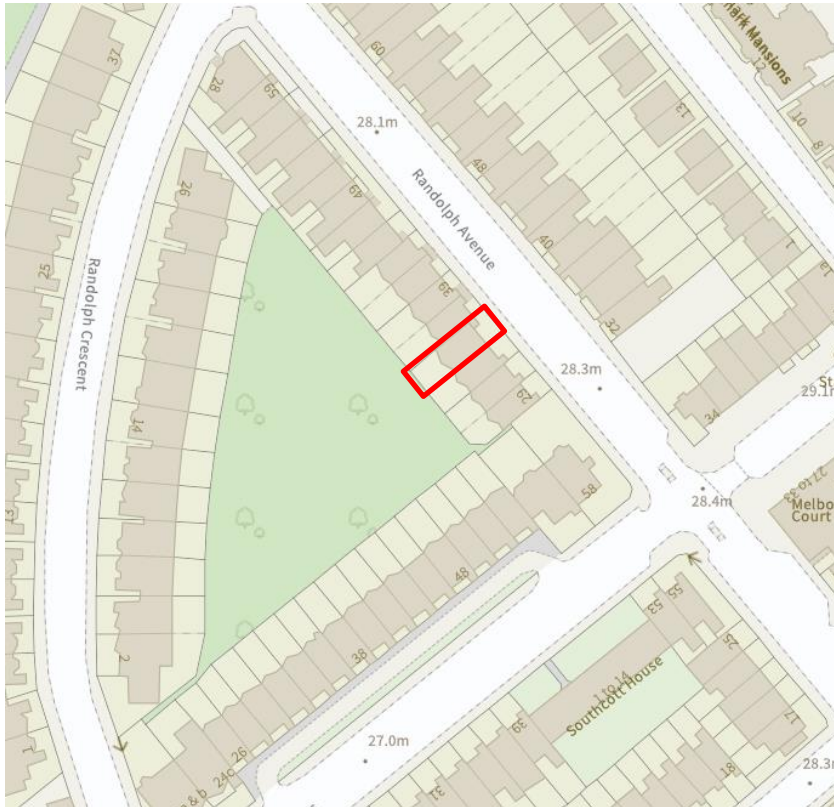


Figure 2: Location of subject property from Historic England's List Entry. Map of The Vine Conservation Area (Sevenoaks District Council). The subject property is indicated with a red arrow

3.2 SITE DESCRIPTION

- 3.2.1. The subject property is part of a long terrace (subject terrace) made up of four to five storey stucco townhouses over semi-basements, built to a carefully designed symmetrical pattern with prominent rusticated ground floors. The subject terrace retains several classical features including cornices, pedimented windows with architraves, Ionic porches and *piano nobiles*, which is accentuated by a generous height, to cast iron balconies. The timber sash windows vary in size with several replacements. The first-floor windows are full height French doors, except one on the subject property which has been infilled and replaced by two smaller windows (on all floors).
- 3.2.2. Entrances are approached by walkways to porches, with access provided by panelled doors in timber. The terraces next to the subject property (no. 37-43) project further out to the street, blocking up one side of the subject property's porch. The rears are much plainer with exposed bricks and openings arranged pragmatically, to provide adequate lighting to stairwells and interior rooms.
- 3.2.3. The status of the subject site is clearly demonstrated in the built scale and proportions, with a wealth of surviving architectural features externally. A further important factor is the use of classical proportion and vertically orientated diminishing fenestration which creates a visually pleasing and balanced composition. The principal facade of the group has a high degree of uniformity and a strong rhythmic pattern created by the use of stucco and repetition of aligned window bays and decoration. This has been disrupted by the infilled window in the subject property.

- 3.2.4. Internally, flat D is reached by the original staircase with ornate cast iron spindles and polished handrail. Flat D occupies the piano nobile, which was used for the principal reception rooms. However, the current layout of the flat is heavily compartmentalised, with the kitchen and bathroom occupying the northeast corner of the front room and the living room to the southeast accessed via a narrow corridor. A mezzanine has been inserted within the living room resulting in a cluttered space. The suspended ceiling has further created a warrenlike layout with no legibility of the former front room proportions. Above the suspended ceiling there is some fragmented original cornice that has survived, however, this is in critically poor condition and at risk of detaching during works. Much of the lath and plaster ceiling has become detached. It is presumed that this has been in this condition since the building was converted into flats. The rear room remains largely intact with full ceiling height and original cornice and skirting boards. None of the original fireplaces have survived, though the rear room has a later replacement.
- 3.2.5. The original two-room deep arrangement of the townhouse has been lost during the refurbishment of the flats in 2006 and few original internal features remain beyond the staircase, traces of cornicing and a fireplace.

3.3 SITE PHOTOS



Figure 3: Front elevation of 35 Randolph Avenue.



Figure 5: Rear elevation.



Figure 4: View looking north on Randolph Avenue.



Figure 6: Stairwell with decorative cast iron spindles and polished hardwood handrail.

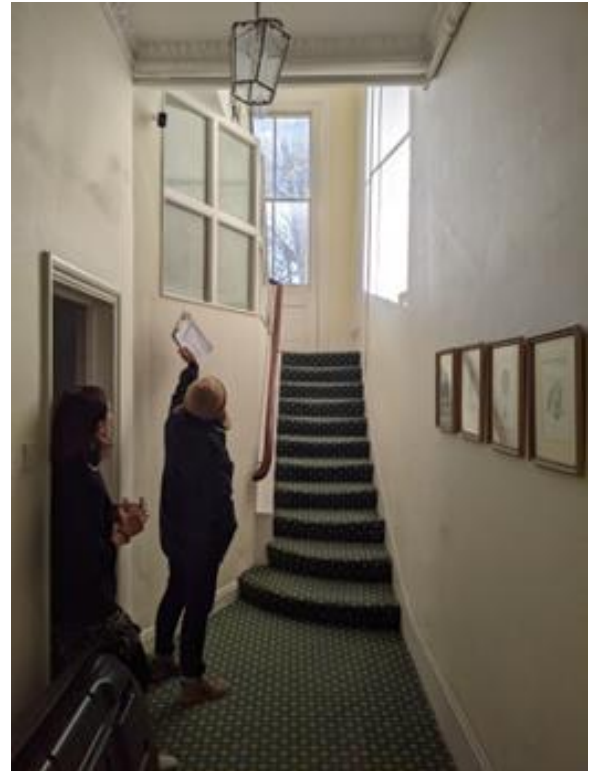


Figure 7: Ground floor staircase in shared entrance



Figure 8: First floor corridor.

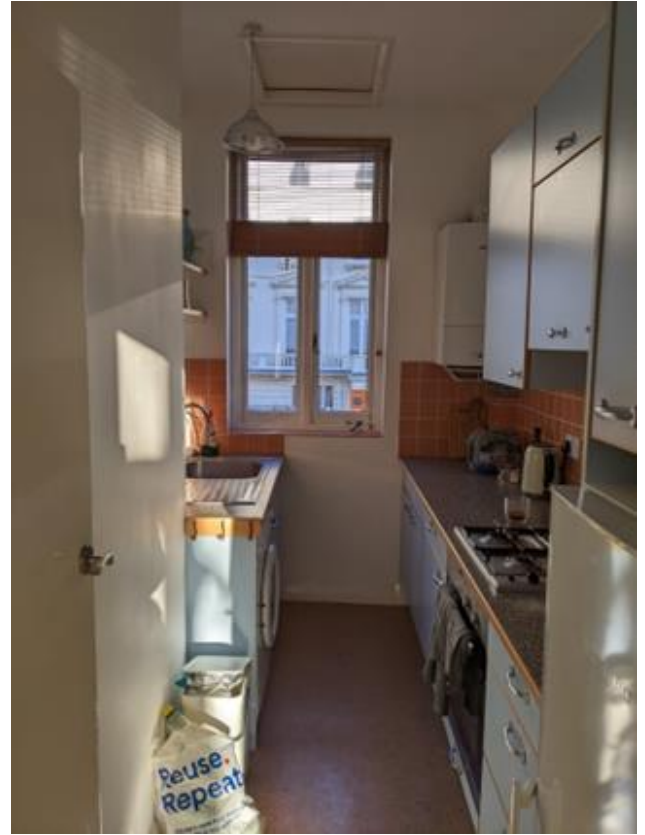


Figure 9: Kitchen area facing the front.

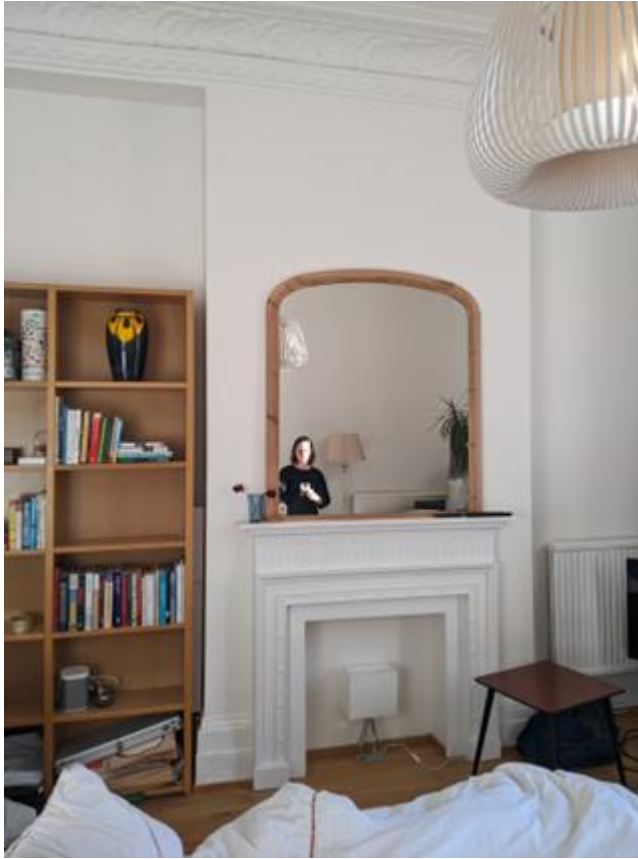


Figure 10: Rear room with fireplace and cornice



Figure 11: Living room with mezzanine



Figure 12: Traces of original cornicing hidden behind the suspended ceiling within the front portion of the flat (above suspended ceiling)



Figure 13: Cornice fragment and damaged lath and plaster ceiling above suspended ceiling

3.4 PLANNING HISTORY

06/04543/FULL. Refurbishment of existing three bedroom maisonette with minor alterations to exterior rear kitchen window. (Maisonette, basement and ground floor). Application permitted. Wed 16 Aug 2006.

06/04544/LBC. Interior refurbishment to maisonette, basement and ground floor. Application Permitted. Wed 16 Aug 2006.

3.5 HISTORICAL BACKGROUND

- 3.5.1. This section provides an overview of the subject site and the historical background relevant to an understanding of the property, its site and its historic context and interest. This is based on accessible records. It is not the purpose of this document to create a detailed historical narrative of the area, but to provide an assessment of the subject property and the site's historical development and heritage potential in accordance with the NPPF.

BRIEF OVERVIEW

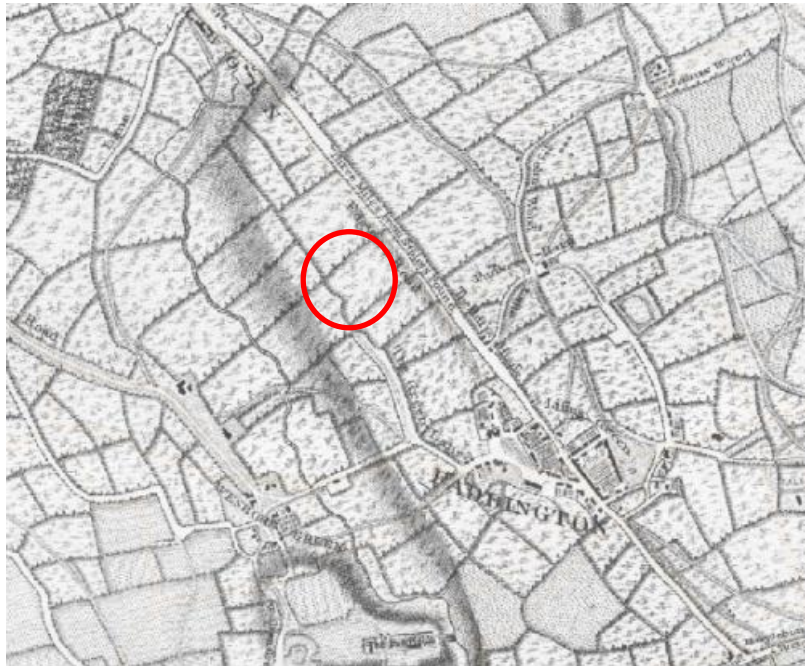
- 3.5.2. The area of the Maida Vale belonged to the Bishop of London in 1647 and consisted mostly of farmland and woodland, with very few buildings except for Kilburn Bridge Farm. The Building Act of 1774 regulated the design and development of new buildings in London (especially in limiting the use of exposed timber) and was the primary drive behind the appearance of many Georgian terraces and houses, which resulted in many new plots being built along Edgware Road and into Paddington Wood, where six detached houses were built in a line. Several other plots were leased in the early 19th century, where various new detached and terraced brick houses were constructed. The name 'Maida' originates from a 19th century public house 'The Heroes of Maida' (named after a naval victory against France in Maida in 1806) on Edgware Road.
- 3.5.3. Early development in the area centred around the construction of the Grand Union Canal and Regent's Canal in 1812; subsequent developments in the 1830s of avenues and streets closely correspond to its geometry. George Gutch's plans for Paddington Estate north of Regent's Canal was similar in scale to Tyburnia; he proposed long avenues, including Randolph Avenue (formerly Portsdown Road), with symmetrical compositions in an elegant classical style, which showed the influence of John Ruskin's Stones of Venice with the surrounding area referred to as 'Little Venice'.
- 3.5.4. Construction in the 1860s was largely pushed by the Bishop of London and the Church Commissioners; these were primarily brick and stucco builds (of which the subject property resides) forming carefully designed rows of terraces and semi-detached houses, with infilled secondary streets and the monotony of the grid-like pattern relieved by crescents. Later developments were constructed in red stock brick and were significantly larger in scale, often forming mansion block flats and apartments such as those on Elgin Avenue and Lanarck Road (adjacent to Randolph Avenue). The Paddington Recreation Ground occupies the northern section of the conservation area, which was landscaped in 1893.
- 3.5.5. There were very few changes up until the Second World War. While the Church Commissioners retained control of the area in the 1950s, there were no rebuilding schemes like that of Tyburnia beside the construction of Melbourne Court to the south of Randolph Avenue by Blomfield Development Corporation in 1960. By 1985, 21 houses on Randolph Avenue had been converted into 123 separate units by the Paddington Churches Housing Association.

3.6 MAP PROGRESSION

3.6.1. The following section will review the subject property and its evolution over time based on available map-based evidence. The approximate position of the subject property is circled in red or pointed to with an arrow on the following maps.

John Rocque's London Map (1746)

In the 18th century this area of north London is predominantly rural. The small settlement of Paddington is recorded to the south of the subject site.



OS Map Surveyed 1865-1866 (published 1871)

Randolph Avenue is recorded by this time, along with the gardens and crescent behind, as well as the terraces to the north and south, representing the current form. Regent's Canal has also been established (seen at the bottom right of the map). Areas to the west of the subject property still remain partially undeveloped.



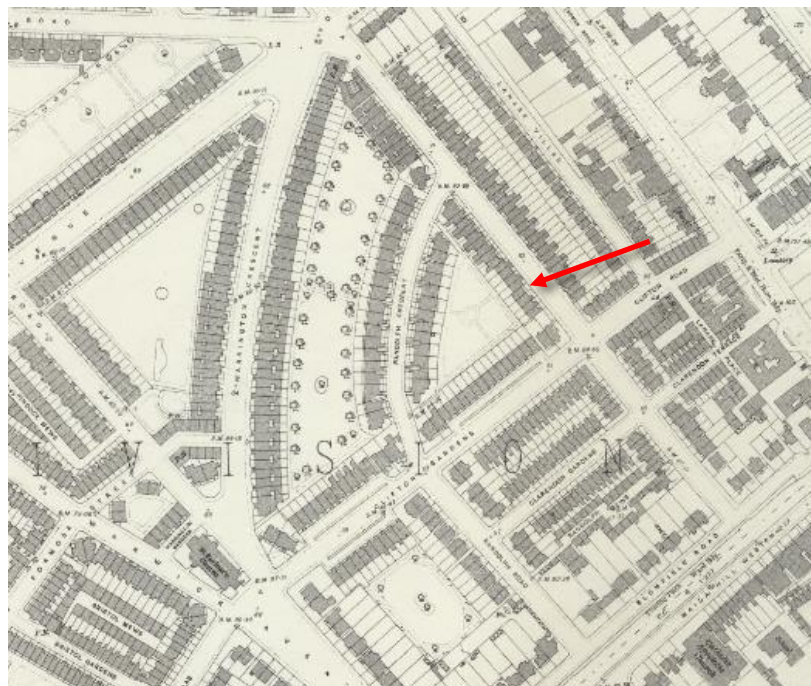
Charles Booth's Poverty Map (1889)

This map is useful in showing the status of the buildings at the time of the survey in 1889. The subject property along with the rest of the terrace is highlighted red, which indicates 'Middle class. Well to do'.



OS Map Revised 1913 (published 1935)

By the early 20th century, the entire area, particularly northwest of the subject property, has been developed with a series of terraces.



Satellite Image 2023 (©Blue Sky, Google Maps)

Very little has changed since the previous survey, with the present plan corresponding to the original 19th century form.



4 STATEMENT OF SIGNIFICANCE

4.1 ASSESSING HERITAGE SIGNIFICANCE

- 4.1.1. Significance is a concept that forms the foundation of conservation philosophy. The NPPF states that heritage 'assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'
- 4.1.2. A heritage asset is defined in the NPPF (Annex 2) as 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (i.e through local listing).'
- 4.1.3. The framework (NPPF Annex 2) goes onto define significance as, 'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'
- 4.1.4. Following Historic England's Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (2008), significance can commonly be derived from five areas:
- **Evidential Value:** this derives from the potential of a place to yield evidence about past human activity. The evidential value of a place is largely derived from physical remains, these remains maybe archaeological (below ground), embedded in upstanding remains within the landscape or within built heritage (above ground remains).
 - **Historical Value:** this derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.
 - **Aesthetic Value:** derives from the ways in which people draw sensory and intellectual stimulation from a place.
 - **Communal Value:** this derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical value but tend to have additional and specific aspects that establish a more direct relationship between a group or groups both in the past and or present.
 - **Setting:** the setting of a heritage asset is defined in the NPPF as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.' Setting is not an asset in itself.

4.2 SUMMARY OF HERITAGE ASSETS

- 4.2.1. The following section is intended to identify any heritage assets (within a given area) that have a potential to be affected by the proposed scheme – either directly through a material change to the asset(s) or through a change to the contribution of setting to an asset(s) significance or the character of an area.

4.2.2. Two heritage assets have been identified as having the potential to be affected by the proposed scheme. They comprise one conservation area and one listed building: These are listed below:

- Maida Vale Conservation Area
- Numbers 29-35 and Front Garden Wall, 29-35, Randolph Avenue W9

4.2.3. Those assets with a potential to be subject to change will be considered in more detail below.

4.3 ASSET: NUMBERS 29-35 (ODD) AND FRONT GARDEN WALL



LISTING ENTRY:

Heritage Category: Listed Building

Grade: II

List Entry Number: 1265306

Date first listed: 01-Dec-1987

Listed building description:

TQ 2682 SW CITY OF WESTMINSTER RANDOLPH AVENUE W9 31/8 (south-west side) Nos 29 to 35 (odd) and front garden wall GV II Terrace and garden wall. Mid C19. Brick, stuccoed with channelled ground

floor. 4 storeys and basement. Each house 2 bays. Nos 29 - 33 have projecting Tuscan porches containing double doors, overlight to No 31. No 35 has an Ionic porch abutting No 37 (qv). Tripartite sashes in vermiculated surrounds to Nos 33 and 35. To first floor, casements in eared architraves, segmental dentilled pediments on consoles to Nos 33 and 35. Sashes in eared architraves above. Cornice to Nos 33 and 35. Balustraded stucco front garden wall. Houses find wall included for group value only.

Listing NGR: TQ2629882301

EVIDENTIAL VALUE

- 4.3.1. "Evidential value derives from the physical remains or the genetic lines that had been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement" (Conservation Principles, Para 38).
- 4.3.2. The subject property is situated within a townhouse on the first floor. It is part of a wider terrace built in the mid-19th century. The townhouse in which the subject property is situated has been substantially altered during the conversion to flats. In addition, many original features that may have demarcated the floor-by-floor hierarchy such as joinery, fireplaces and cornices have been lost. As such, there is little remaining evidence of how the building was used historically. However, some internal features remain such as the ornate staircase leading to the first floor and fragments of cornice within the subject property which show evidence of traditional craftsmanship. While there may be potential for archaeological remains and foundations of earlier buildings, these are likely to have been damaged during subsequent construction phases. As such, the evidential value is low.

HISTORICAL VALUE

- 4.3.3. "Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative." (Conservation Principles Para 39).
- 4.3.4. "The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value." (Conservation Principles Para 44).
- 4.3.1. The site was conceived simultaneously with the establishment of Regal Canal in the early 19th century. This terrace along with its counterparts within the surrounding area form an exemplary upper-middle class development of early Victorian urbanisation. In terms of urban planning, the legibility of the original design is still readily apparent with the many classical architectural features on the façade that contribute to the legibility of the terrace's status as a 'well to do' residence. The site's association with notable architects, such as Gutch, contribute to the historic interest. The site contributes to the early Victorian urbanisation of Maida Vale which remains largely intact.
- 4.3.2. Many internal features of interest, including joinery and some decorative elements have not survived. Furthermore, the legibility of hierarchy is no longer possible due to the conversion of no.35 into flats. There is therefore no appreciation of the relative proportions or level of décor on a floor-by-floor basis beyond the ornate staircase. The

original layout within the subject property has been significantly altered with the compartmentalisation of the front room to create a kitchen, bathroom and living room area. This has significantly eroded the illustrative value. As such, the historic value is considered to be low to medium.

AESTHETIC VALUE

- 4.3.3. "Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place". (Conservation Principles Para 46).
- 4.3.4. "Aesthetic values can be the result of conscious design of a place including artistic endeavour. Equally they can be the seemingly fortuitous outcome of the way in which a place has evolved and be used over time. Many places combine these two aspects. Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive." (Conservation Principles Para 47).
- 4.3.5. "Design value relates primarily to the aesthetic qualities generated by the conscious design of the building, structure or landscape as a whole. The embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship." (Conservation Principles Para 48).
- 4.3.1. The townhouses on Randolph Avenue are 'first rate' houses designed for the upper-middle class. This is evident from the scale, mass and decorative details in the street facing elevations. The exterior of the terrace has been well preserved with original features of architectural interest, including rusticated base, balconettes and detailed architraves at *piano nobile* level, Ionic porches and stucco detailing. This forms a pleasant conscious composition that, along with the other terraces, is part of a street of local and national importance, forming an important urban backdrop within the Maida Vale Conservation Area. Its original decorative features alongside the classical proportionality of the terrace forms one visually unified building which forms part of a coherent series laid out in the 19th century.
- 4.3.2. Internally, the planform is not intact; the proportions within each floor are no longer perceivable or relative to one another due to the conversion into flats. No original fireplaces have survived, while some original cornicing is hidden above a suspended ceiling in the front room. The rear room has retained its original footprint, proportions, cornice and skirting boards.
- 4.3.3. The overall composition and form of Randolph Avenue, creates the style of terrace which was typical of high-class urban development in the early 19th century. This creates a rich period character externally, providing a complete narrative of the building's original aesthetic quality, which in turn contributes to the other values of significance. The infill of one of the front elevation windows has detracted from the aesthetic value, however, the aesthetic value is high externally. Internally the aesthetic value is low due to the later additions which conceal original fabric. Furthermore, the isolation of the rooms has negated the once visually unified scheme when it was a townhouse.

COMMUNAL VALUE

- 4.3.4. "Communal value, derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical value, but tend to have additional and specific aspects" (Conservation Principles, Para 54).

- 4.3.1. Randolph Avenue contributes to the townscape in an area of London that is of national and international reputation. Although the residential units are privately owned, the main façade is appreciated and enjoyed from the public realm by locals and visitors who pass through the area. Communal value is therefore medium.

SETTING

- 4.3.2. In this case the key significance of the building relates to its historic and architectural contribution to the development of this part of Maida Vale and reflects its transformation to higher density upper-middle class dwellings. The site, along with others in the group and elsewhere in the Maida Vale Conservation Area are a tangible reminder of built environment patterns of 19th century urban life. The terrace has significant group value, townscape interest and historic merit, due to its urban layout, unified front elevation and its strong relationship to the surrounding buildings which are of a similar age and character. From the public realm, the group character is only perceived from the front elevation. The terrace in which the subject property is located has a high degree of architectural value to its front facade and reflects the prevailing style, materials and detailing of the period, making a clear aesthetic contribution to the setting of Randolph Avenue and Maida Vale Conservation Area.

5 RELEVANT LEGISLATIVE & POLICY CONTEXT

5.1 INTRODUCTION

- 5.1.1. In determining any planning application for development, the local planning authority will be guided by current legislation, government planning policy, and the policy and guidance set by the relevant Local Planning Authority (LPA).
- 5.1.2. The following section sets out the legislative and planning policy context for the proposed scheme, including national and local planning guidance.
- 5.1.3. The applicable legislative and policy framework to this assessment includes the following:
- The Town and Country Planning Act 1990;
 - The Planning and Compulsory Purchase Act 2004;
 - The Planning (Listed Buildings and Conservation Areas) Act 1990, and
 - Planning Act 2008.
 - Section 16 of The National Planning Policy Framework (NPPF) 2023
 - The London Plan 2021
 - Local Planning Policy
- 5.1.4. In addition to the above the following guidance is also applicable:
- National Planning Policy Guidance (NPPG)

5.2 THE PLANNING (LISTED BUILDING CONSENT AND CONSERVATION AREAS) ACT 1990

- 5.2.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 (P(LBCA) Act) sets out the legal requirements for the control of development and alterations which affect heritage assets.
- 5.2.2. Any decisions relating to conservation areas must address the statutory considerations of the P(LBCA) Act 1990. The key elements of this Act relevant to this heritage statement are outlined below:
- 5.2.3. Section 16 of The Act states that in considering whether to grant listed building consent for development which affects a listed building, the decision maker should have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."
- 5.2.4. Section 66 of the Act places a duty upon the decision maker in determining applications for planning permission affecting listed buildings to pay special attention to the desirability of preserving or enhancing the character or the listed building.
- 5.2.5. Section 72 of the Act places a duty upon the decision maker in determining applications for planning permission within conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

5.3 NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 5.3.1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The framework recognises the need for the planning system is to contribute to the achievement of 'sustainable development', through achieving three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- 5.3.2. a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- 5.3.3. b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- 5.3.4. c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.3.5. Paragraph 11 of the framework states that 'plans and decisions should apply a presumption in favour of sustainable development'.
- 5.3.6. Section 16, paragraphs 189 to 208, of the framework sets out the national planning policy basis for conserving and enhancing the historic environment.
- 5.3.7. Paragraph 189 recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not.
- 5.3.8. Paragraph 194 places a duty on local planning authorities to require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 5.3.9. Paragraphs 199 to 208 of the framework address the impact of a proposed development on the significance of designated and non-designated heritage assets.
- 5.3.10. Paragraph 199 of the framework states that, 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'
- 5.3.11. Paragraph 200 of the framework states that, 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected

wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'

- 5.3.12. Paragraph 201 of the framework states that, 'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.'
- 5.3.13. Paragraph 202 of the framework states that, 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'
- 5.3.14. Paragraph 207 of the framework states that, 'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'

5.4 THE LONDON PLAN (2021)

POLICY HC1(C)

- 5.4.1. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

5.5 LOCAL DEVELOPMENT STRATEGY FOR WESTMINSTER

WESTMINSTER CITY PLAN 2019-2040 (ADOPTED APRIL 2021)

Policy 39

"...ensure heritage assets and their settings are conserved and enhanced, in a manner appropriate to their significance; secure the conservation and continued beneficial use of heritage assets through their retention and sensitive adaptation which will avoid harm to their significance, while allowing them to meet changing needs and mitigate and adapt to climate change...Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric..."

SUPPLEMENTARY PLANNING GUIDANCE: REPAIRS AND ALTERATIONS TO LISTED BUILDINGS

Paragraph 2.4: Internal Alterations

"Internal alterations should normally be entirely in accordance with the period, style and detailing of the original building or with later alterations of special architectural and historic interest.

Wherever possible existing detailing and the contemporary features of the building should be preserved, repaired or, if missing, replaced. All works, whether they be repairs or alterations, will be required to be carried out in a correct scholarly manner, under proper supervision, by specialist labour where appropriate.

The Council will need to be satisfied that alterations to listed buildings are justified, and that the overall effect of a proposal is not detrimental to the architectural or historic integrity or detailing of the interior."

6 IMPACT ASSESSMENT

6.1 INTRODUCTION

- 6.1.1. This section will consider the impact of the proposals on the significance of Flat C, no.35 Randolph Avenue as a building of special architectural and historic interest and the character and appearance of the Maida Vale Conservation Area. The proposals will be assessed in line with the relevant statutory duties and the national and local heritage policy context.
- 6.1.2. It is recommended that the following be read alongside the supporting documentation and drawings provided in the supporting submission.
- 6.1.3. The proposals will be assessed based on the policies and guidance set out by Historic England in Conservation Principles, Policies and Guidance (2008) and against criteria set by Historic England as published in Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets.
- 6.1.4. The overall impact of proposals can also be neutral, beneficial or adverse. The magnitude of change will be categorised as:
- None: no material change.
 - Negligible: apparent change and change with a negligible effect on the ability to understand and appreciate the significance of heritage assets.
 - Minor: changes that only make a small difference to the ability to understand and appreciate the significance of heritage assets.
 - Moderate: a change that makes an appreciable difference to the ability to understand and appreciate the significance of heritage assets.
 - Substantial: a fundamental change in the ability to understand and appreciate the significance of heritage assets.

6.2 PROPOSALS

- 6.2.1. The scheme is for internal and external alterations within the first floor level flat. This will include removals of later partitions and mezzanine, thus reinstating the front room footprint. A new bathroom and kitchen are proposed within the front room (with associated services to run the existing routes) and the suspended ceiling will be removed with a new one in place to better resemble the room's original height. Within the kitchen area will be a new electric combi boiler with flue. The front window which was altered as part of the conversion into flats will be reinstated and the existing French doors will be replaced with a slimline glazed unit with glazing bars to match the original window configuration. The glazing in the rear French window will be replaced with slimline glazing. New timber flooring is proposed throughout with tile in the bathroom pod. A new SVP will connect to the existing in the second floor and ground floor level.

6.3 IMPLICATIONS

- 6.3.1. **Reconfiguration of the front room:** This includes the removal of all the later partitions, kitchen, bathroom, hallway, mezzanine and living room. The room will be fully reinstated to a single large reception room. An open plan room will include a kitchenette which will be located against the north party wall with a small bathroom pod in the corner. The bathroom pod will be clad to appear as joinery and not reach the full height of the room to retain the full legibility of the original footprint. This will be beneficial in terms of better revealing the significance of the listed building. In terms of M&E, the soil vent pipe will connect to an existing one at ground and second floor levels in the northeast corner of the room and will be mostly concealed behind kitchen cabinets. A new combi boiler will be located within one of the kitchen cupboards with extractor vent created above an existing one (which will be used for the bathroom). The 1970s flat entrance door and screen will be removed and a new four panelled timber door with fanlight will be installed. This will be far more in keeping with the historic character of the listed building.
- 6.3.2. **Removal of the existing suspended ceiling:** Following consultation with plaster specialists Locker and Riley, various options were discussed for the existing fragments of the original ceiling. It was their view that given the highly fragile state of the historic fabric, the removal of the suspended ceiling would likely further damage the already fragmented lath and plaster ceiling, cornice and roses and they would therefore not be salvageable. The most feasible option is to retain as much of the original fabric as practicably possible and create a new suspended ceiling just below the lowest line of the decorative cornice. A new cornice as close to the original profile as possible will be installed. This proposal will reinstate the ceiling height much closer to the original height and create a decorative scheme much more in keeping with the status of the room. The remaining fabric above the new ceiling will remain in situ and should future investment go into reinstating the original ceiling like for like, profiles can be taken from the original cornice and roses. Although this proposal does not reinstate the original fabric, the original remaining fabric will be retained, and the new height and cornice will better represent the proportions and décor that is far more in keeping with the principal room within the original townhouse. As such, it is considered to be a heritage benefit on balance.
- 6.3.3. **Removal of infill to reinstate the French doors in the front elevation:** The infill of the window has negatively impacted the front elevation, particularly given it occurs on each level in no.35. The reinstatement of the window is therefore considered to better reveal the significance of the listed building and enhance the character and appearance of the Maida Vale Conservation Area. This is a clear heritage benefit.
- 6.3.4. **Slimline glazing:** The existing front French doors will be replaced with new to match the original configuration. The glazing will be double slimline. These windows are not original and as such, their replacement will not require the removal of any historic fabric. The original design intent will be retained through the use of timber and matching the frame profiles. The rear French door glazing itself appears to be more recent float glass and it is likely that the doors are later, given the rear elevation would have been reserved for the less expensive glazing with more glazing bars. The fanlight appears to be original. The doors are single glazed and draughty, and the proposal is to replace the doors with slimline double glazing. The fanlight glazing will be replaced with slimline glazing. Given the doors appear to be later replacements and the glazing itself in both the doors and fanlight is non-original float glass, the proposal will not require the removal of any historic fabric.
- 6.3.5. **New spine wall to subdivide the front and rear rooms:** The existing spine wall appears to have been moved from its original position. This is evident when looking at the survey drawings in plan and section but also upon visual

inspection. Where the cornice meets the wall, there is a step which offsets the partition from the original cornice (Figure 14). The proposal is to realign the spine wall to its original position, which will remediate the awkward existing junction at the cornice in the rear room. Double doors will be created in the new spine wall for access into the proposed bedroom (rear room). The purpose of this proposal is to reinstate the partition in its original position. The fabric itself is not historic and the cornice, which is original, will be retained. There will be no impact on the fabric of the listed building and the repositioning of the wall will be in keeping with the original, thus retaining the two room deep planform. Impact is therefore beneficial, though minor.



6.3.6.

Figure 14

6.3.7. **Floor finishes:** The existing flooring is a poor quality vinyl in the kitchen and bathroom and engineered/laminate timber in the bedroom and living room. All existing flooring will be removed and replaced with new timber flooring throughout and tiles in the bathroom pod. This will be an improvement to the current floor finish and will not impact the fabric of the listed building.

7 CONCLUSIONS

- 7.1.1. The NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. This HS has identified the heritage assets with a potential to be sensitive to the proposed works, it has considered their significance and assessed the impacts of the proposed works on their significance.
- 7.1.2. In line with paragraph 202 of the NPPF, and as assessed above, it is considered that the proposed scheme will have no adverse impact upon to the significance of the grade II listed building of the Maida Vale Conservation Area. Indeed, the proposal include many benefits that will better reveal the significance of the listed building through reinstatement of the original floor plan and front room proportions. The reinstatement of the French doors will also better reveal the significance of the listed building and enhance the character and appearance of the conservation area.
- 7.1.3. Based on the above it is concluded that the ability to understand and appreciate the core heritage values that contribute to the significance of the heritage assets and is therefore believed to be in accordance with relevant legislation and national and local planning policy.

Thank you for viewing our Heritage Statement.

If you have any queries or would like to discuss anything further with us please don't hesitate to get in contact hello@fullerlong.com

