

Heritage Statement

The Western, Rickmansworth, Hertfordshire

February 2024

Punch Partnerships (PML) Limited



CONTENTS

- 1. Introduction 1
- 2. Historic Background 2
- 3. Identification of Assets and Assessment of Significance 5
- 4. Development Proposals 8
- 5. Assessment of Impact 9
- 6. Summary of Findings 9

Bibliography

Appendices

- A. Legislative and Policy Framework
- B. Methodology

Document Data

Document:
Project: The Western, Rickmansworth, Hertfordshire
Client: Punch Partnerships (PML) Limited
Project Number: 2023-016
Date: February 2024

1. Introduction

1.1. Report Background

This Heritage Statement ('report') has been prepared by RP Heritage on behalf of Punch Partnerships (PML) Limited (the Applicant). The purpose of the report is to ascertain and assess the impact of a proposed development of a three storey apartment block containing three 1 x bed apartments on the heritage significance of heritage assets surrounding and within the vicinity of the Site (Figure 1.1 and Plate 1.1).

Other documents have been referred to in the writing of this report and should also form important background reading for the report. These include (but not exclusively) both national and local government policy and guidance including Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), Section 16 of the NPPF, and Policy CP12 of the Three Rivers Core Strategy (Adopted October 2011) and Policy DM3 of the Development Management Policies Local Development Document (Adopted July 2013). The findings of this report are based on a detailed understanding of the Site and its surroundings through archival research, a site visit carried out in July 2023 together with an application of professional judgement.

1.2. Site Description

The Site is centred at approximately TQ 05683 94432 and consists of the Western and its car-park to the rear, 205 High St, Rickmansworth, also addressing Wensum Way. The surroundings are urban in form with a mix of residential development and retail forming the surroundings.

1.3. Heritage Assets

There is a requirement under national policy for an applicant of development proposals to ascertain what constitutes the 'significance' of any heritage assets identified, what potential effects the development proposals will have on that heritage asset's significance, and how such effects would be mitigated. Section 4 sets out the heritage assets considered within this report, and provides a description of the assets, together with an analysis of their significance and the degree to which their setting contributes to their significance.

This assessment follows the Historic England guidance and methodologies set out in GPA 2 and GPA3, whilst referencing English Heritage's *Conservation Principles* (EH, 2008) to ascertain what constitutes an asset's significance or its 'heritage values', as well as the Principles of Selection for Listed Buildings, with specific regard to the principle of group value listing. Appendix B provides a detailed description of these documents, and how they have been used to inform this assessment.

1.4. Development Proposals

The proposals are for the development of a three storey apartment block containing three 1 x bed apartments with associated private amenity spaces.



Figure 1.1: Site Location



Plate 1.1: Satellite imagery of the Site (courtesy ESRI, 2022)

2. Historic Background

Whilst there is some evidence of prehistoric and Roman activity in and around Rickmansworth and Croxley Green, primarily from Paleolithic to Mesolithic flint scatters, some Neolithic pottery, a Bronze Age palstave and fragments of Roman pottery, By 793AD, Rickmansworth was one of the five manors endowed to the Abbey of St Albans, founded by King Offa. It was mentioned in the Domesday Book, named as Prichemareworde, when it lay in the Hundred of St Albans, with a population of 45 households in 1086, putting it in the largest 20% of settlements recorded at that time, and remained in the ownership of the Abbey of St Albans until the Dissolution, when it was leased to a John Palmer, and eventually granted to the Bishop of London in 1550, until it was then granted to Queen Elizabeth in 1591, remaining in Royal ownership until 1616. The manor eventually came to Henry Fotherley Whitfield in 1753, who built a new mansion in Bury Park (now Rickmansworth Park), moving away from The Bury, near the church.

By 1838 (Figure 2.1), the town remains focused along the High Street and Church Street, forming a largely linear settlement with meadows to the south and field systems and Rickmansworth Park to the north, a situation which largely remains by 1868 (Figure 2.2). The 1899 map (Figure 2.3) shows some new development to the north of the church and around Rectory Lane and Rectory Road (now the A412), to the north of the Site, with little change by 1921 (Figure 2.4) whilst the railway has also now been extended to the north.

The interwar years (Figure 2.5) start to show new roads being laid out to the west and north-west of the town, with the 1945 aerial photograph (Figure 2.6) showing this expansion now completed and new plots to the north being commenced. There is little further expansion by 1960 (Figure 2.7), but by 1970 (Figure 2.8), as with much of the country, there is considerable expansion, in particular to the north around Rickmansworth Park and to the south of the river. This situation largely remains the same through the rest of the twentieth century (Figures 2.9 and 2.10) and to the present day (Figures 2.11 and 2.12).

Looking at the Site in more detail, in 1838 (Figure 2.13), the Site is occupied by a cottage and garden, owned by the Trustees of Thomas Brown Weedon and occupied by John Dixon, with open fields to the immediate west. However, by the 1870s (Figure 2.14), the cottage has been replaced with a pub, ran by a James Coller, with orchards to the rear. The land to the north is still open fields, and there is a smithy to the east and a silk mill to the south. An infant school has also been constructed to the north-east. There is little change to the Site itself by 1898 (Figure 2.15), although the development along Rectory Road and Rectory Lane can be seen in more detail, whilst the silk mill has now been converted to a mineral water works, and the station has been constructed. The 1914 map (Figure 2.16) shows the development along Ebury Road to the south of the Site with the environs largely remaining the same by 1932 (Figure 2.17). By 1961 (Figure 2.18) there is little further change, although the boundaries of the fields surrounding the pub have been removed, providing a large garden for the pub, although part of this is developed by Wensum Way by 1971 (Figure 2.19). Little further change is documented on the available mapping at this scale.



Figure 2.1: Tithe map, 1838



Figure 2.2: Ordnance Survey 1:10,000 1868



Figure 2.3: Ordnance Survey 1:10,000 1899

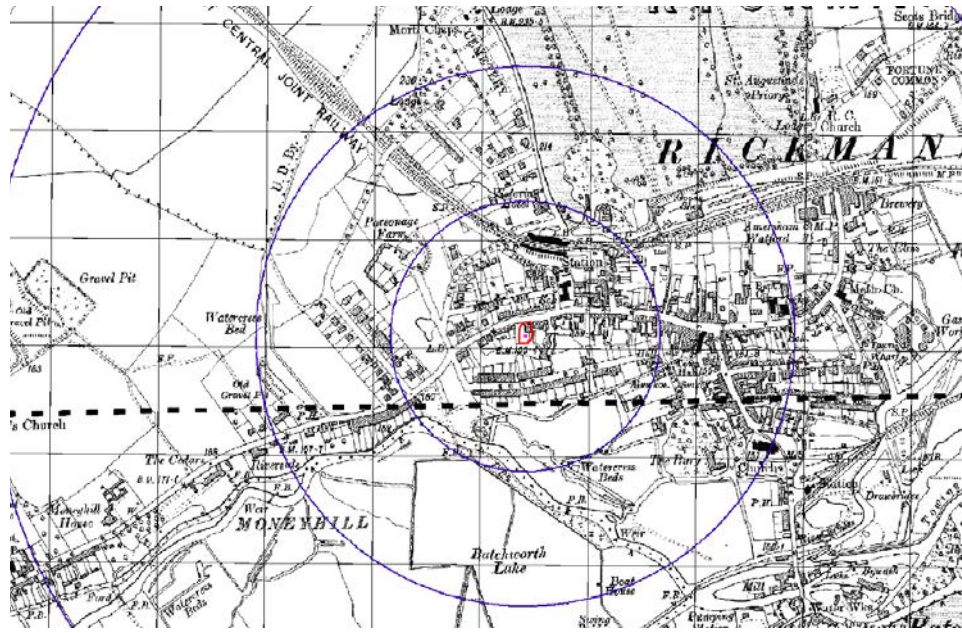


Figure 2.4: Ordnance Survey 1:10,000 1921

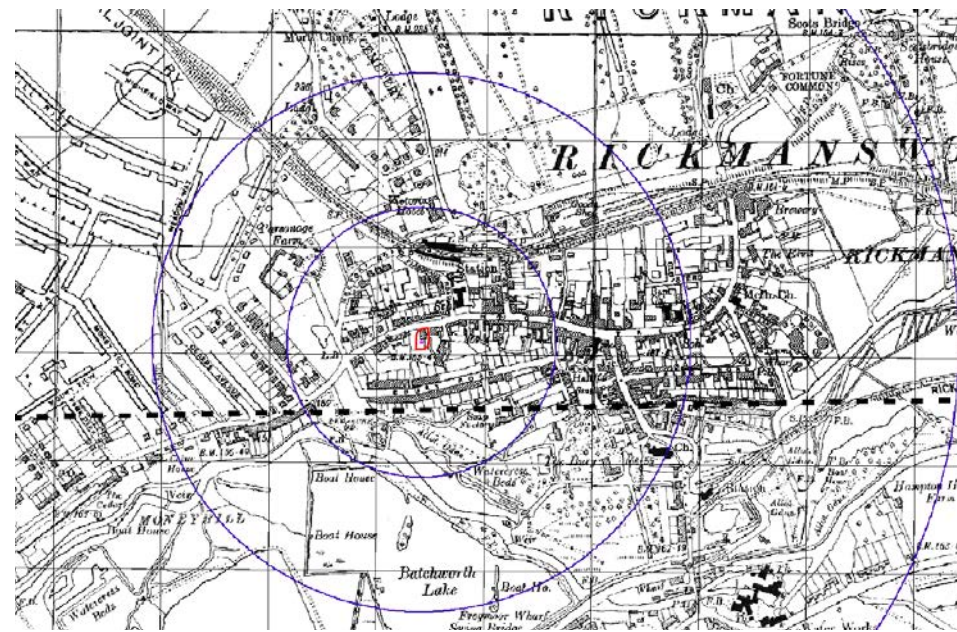


Figure 2.5: Ordnance Survey 1:10,000 1938



Figure 2.6: Ordnance Survey aerial photograph 1945



Figure 2.7: Ordnance Survey 1:10,000 1960

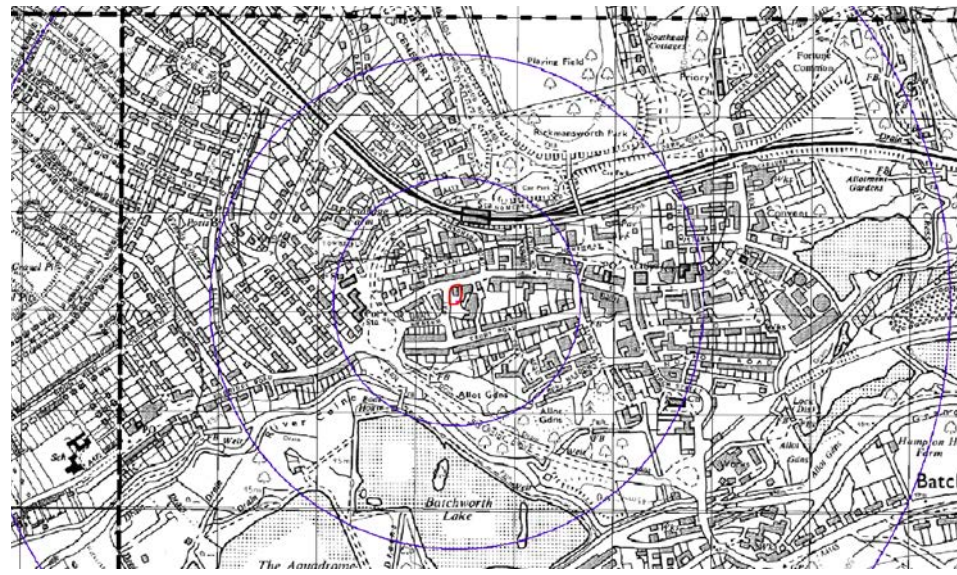


Figure 2.8: Ordnance Survey 1:2500 1970

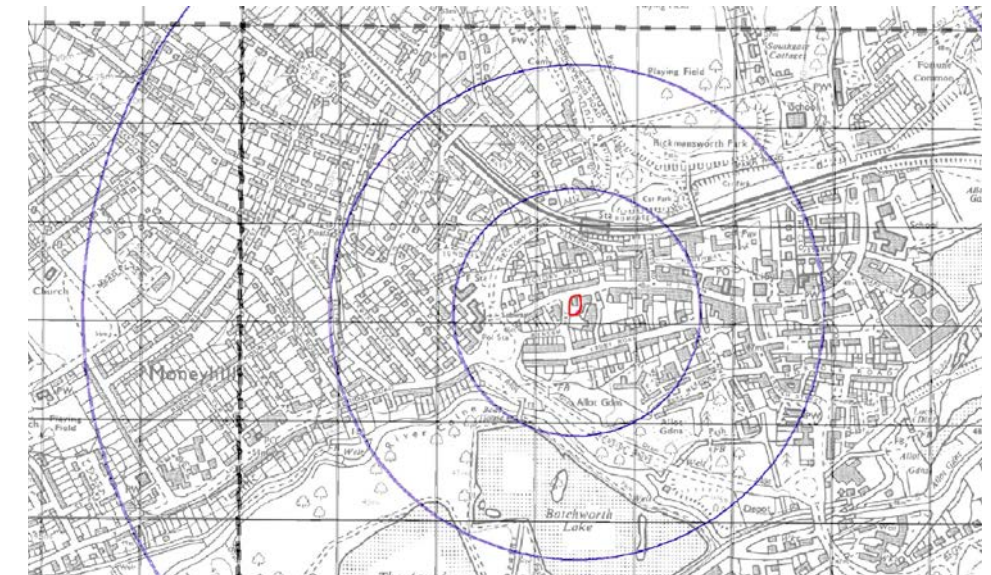


Figure 2.9 Ordnance Survey 1:2500 1990

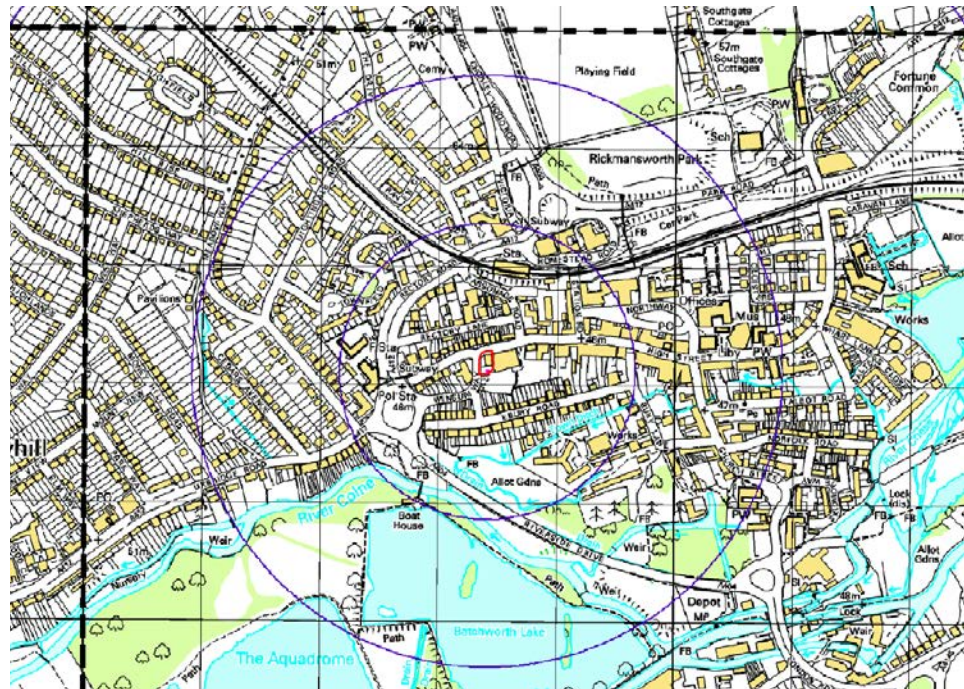


Figure 2.10: Ordnance Survey 1:10,000 1999

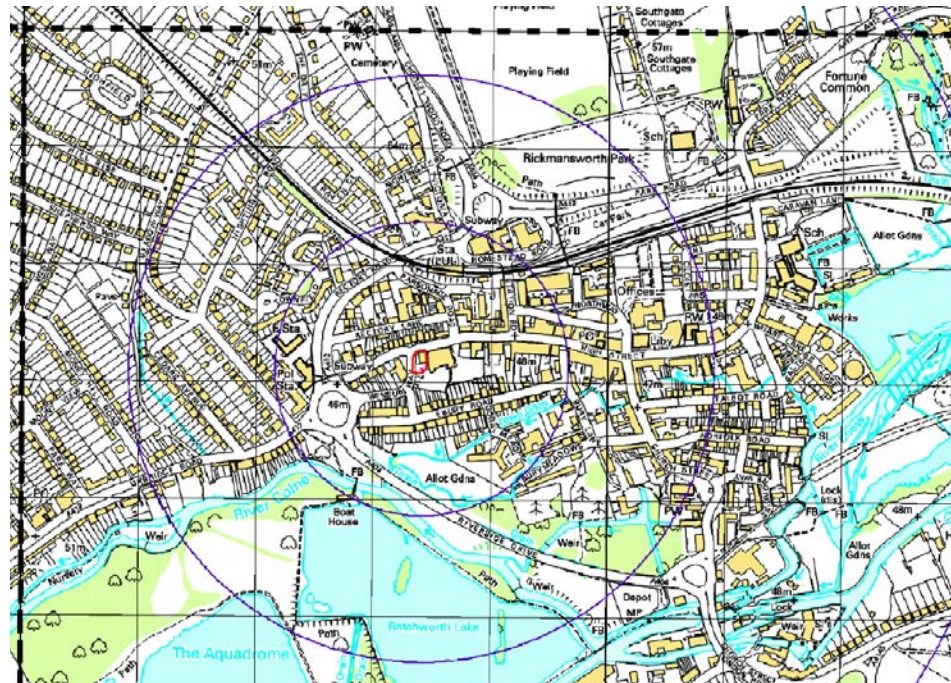


Figure 2.11: Ordnance Survey 1:10,000 2006

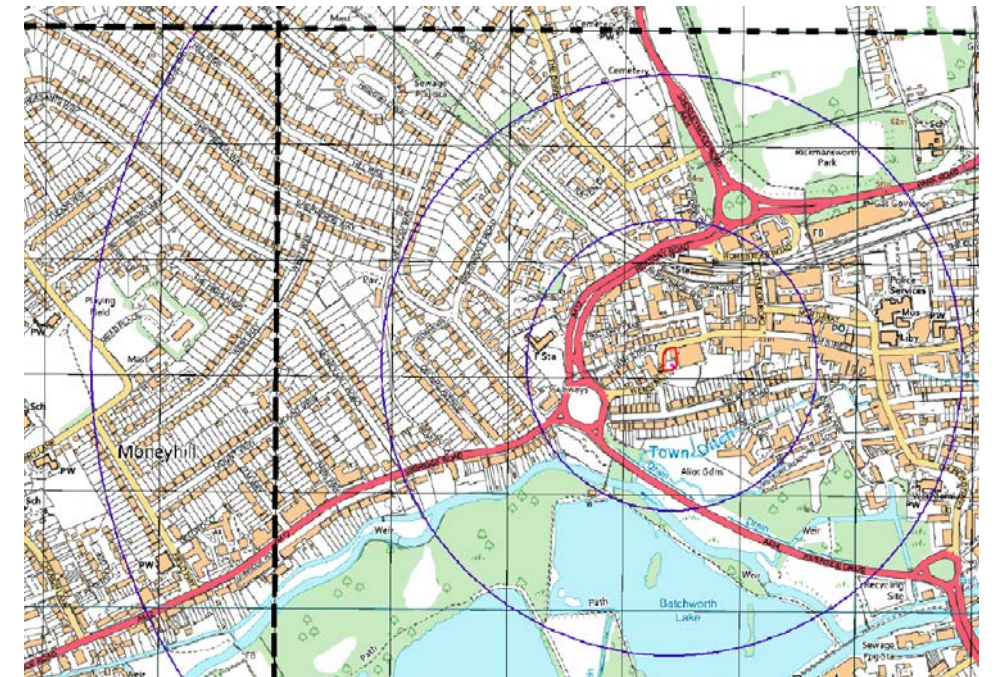


Figure 2.12: Ordnance Survey 1:10,000 2023



Figure 2.13: Tithe detail, 1838

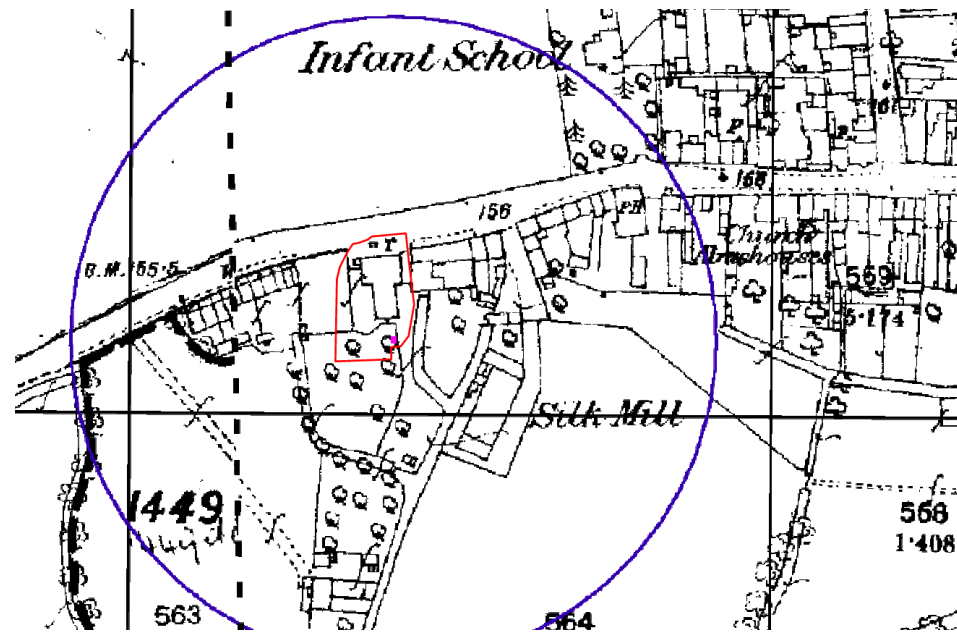


Figure 2.14: Ordnance Survey 1:2500 1873

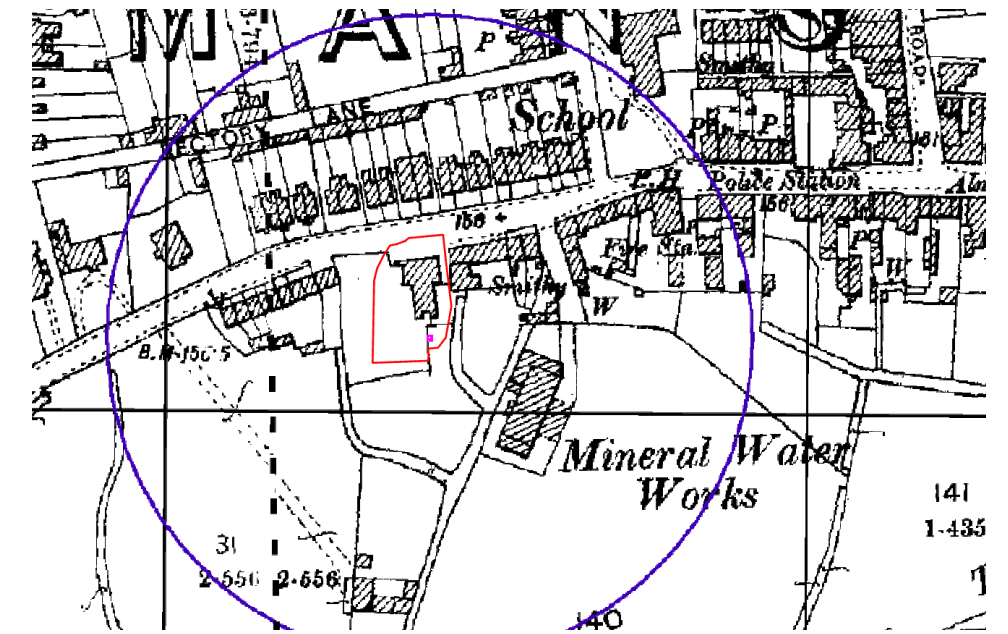


Figure 2.15: Ordnance Survey 1:2500 1898

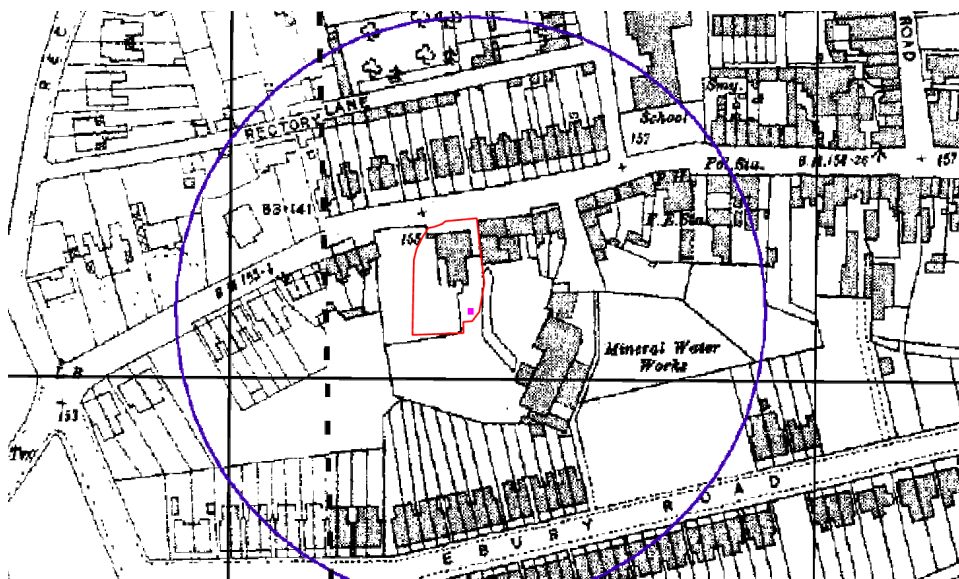


Figure 2.16: Ordnance Survey 1:2500 1914



Figure 2.17: Ordnance Survey 1:2500 1932

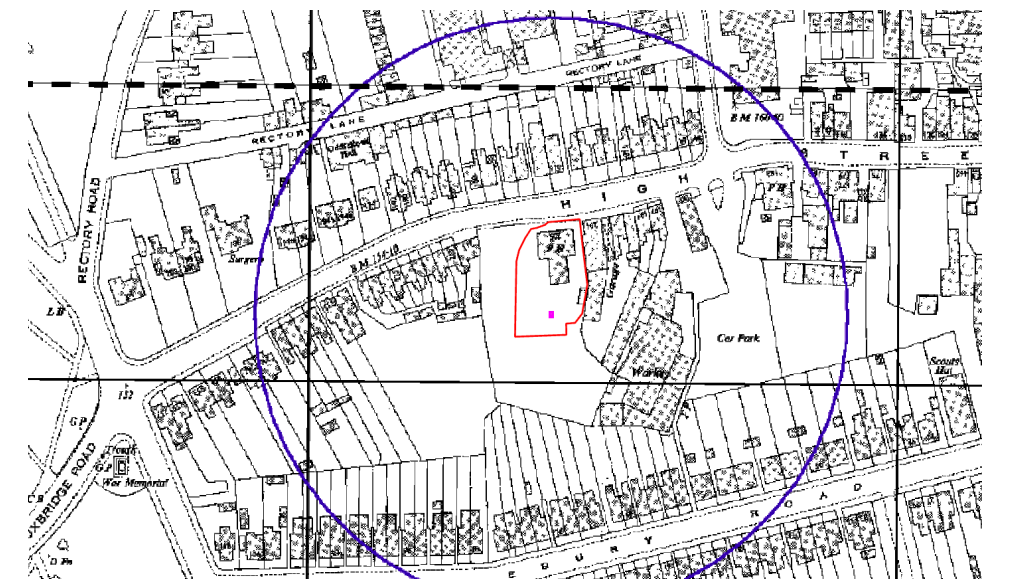


Figure 2.18 Ordnance Survey 1:2500 1961

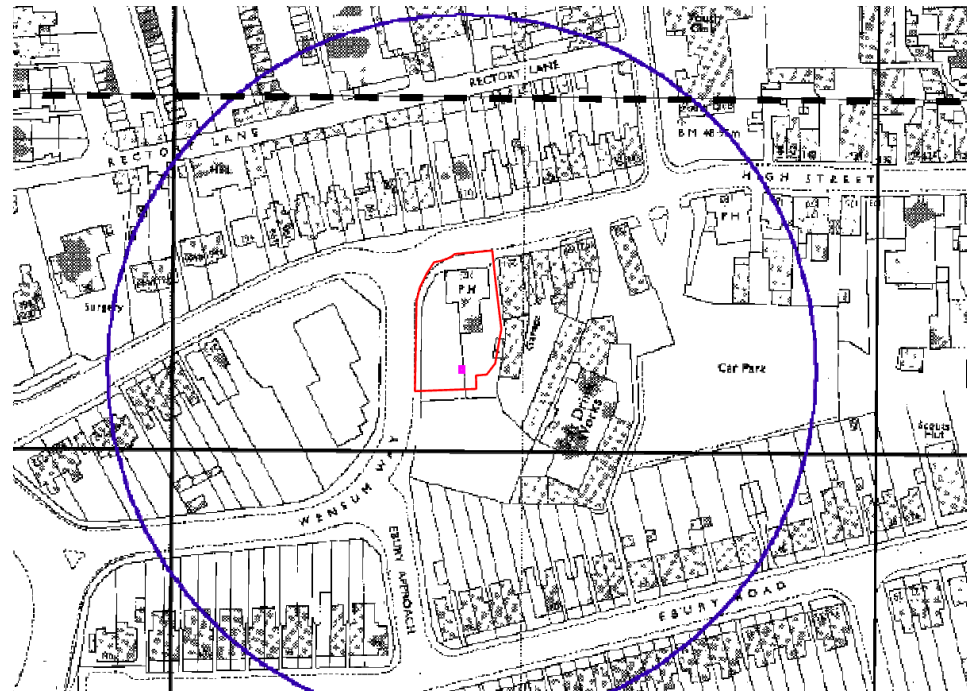


Figure 2.19: Ordnance Survey 1:2500 1971

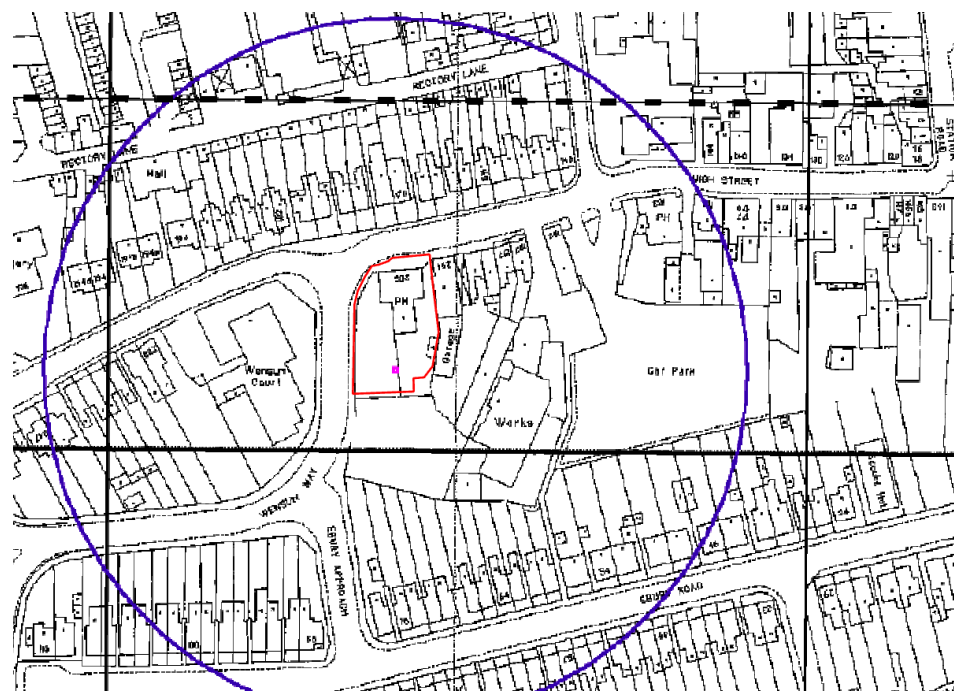


Figure 2.20: Ordnance Survey 1:2500 1992

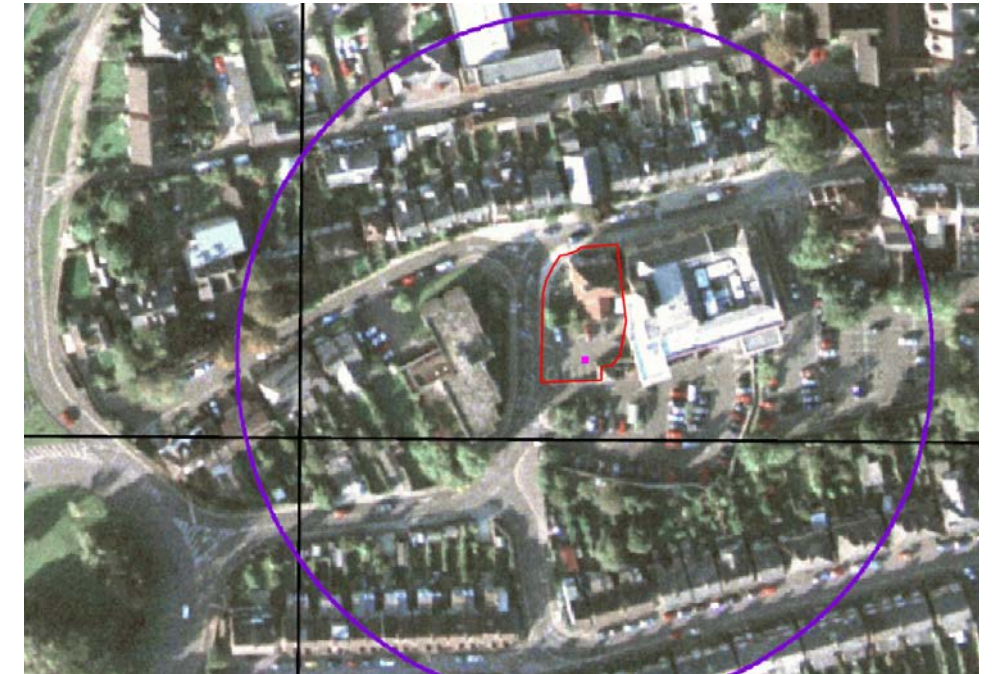


Figure 2.21: Ordnance Survey aerial photograph 1999

3. Identification of Assets and Assessment of Significance

3.1. Heritage Assets Identified

An inspection of the relevant databases and sources, including the Historic Environment Record (HER), the National Heritage List for England (NHLE), and the Council’s web-site, has identified two Grade II listed buildings as lying within 100m of the Site, whilst the Site also lies within the Rickmansworth Conservation Area. Whilst the Western is not identified as a locally listed building, due to its age, dating to the mid-nineteenth century, it is considered herein as a non-designated heritage asset. Due to the urban form between the Site and the two listed buildings, there is not considered to be any potential impact upon their significance. Thus, this report will consider the Rickmansworth Conservation Area and the Western, as a non-designated heritage asset, as whose significance may be affected by the proposed development, in line with the requirements of the legislative and policy framework. As such, Table 3.1 and Figure 3.1 set out the heritage assets considered within this report, with no impact considered to the significance of other heritage assets.

The level of detail provided should be proportionate to the importance of each heritage asset, and no more than is sufficient to understand the potential impact that may arise from the development proposals.

	Heritage Asset	Designation Date
1.	The Western	N/A
2.	Rickmansworth Conservation Area	1974,1980

Table 3.1: Heritage Assets Considered Within This Assessment

3.2 Assessment of Significance

The Western

Description

Sitting over three storeys and three bays, the building is raised from a square planform, constructed in a reddish buff brick. To the front elevation, the building is painted brickwork at the ground floor, with a central recessed partially glazed door. To each side is a bay with three 12/12 light sash windows, with a timber fascia running across the width of the elevation. The first floor has three 3/6 sash windows with rednered cills and rendered voussoirs with a central key stone, whilst the second floor has a further three 3/3 light sash windows, again with rendered cills and voussoirs.

To the rear, a modern single-storey wing projects at ground floor, with a gabled roof covered in red plain clay tiles, with a further covered timber structure and a pergola, running around to the side of the building. At first floor, there is one 3/6 timber sash window, and smaller central windows, created from a partially infilled windows, and a doorway, again created from a window opening, leading to the apartments at first and second floor. The second floor has three 3/3 light sash windows, with all the windows having rendered cills and brick arched lintels. A further single-storey

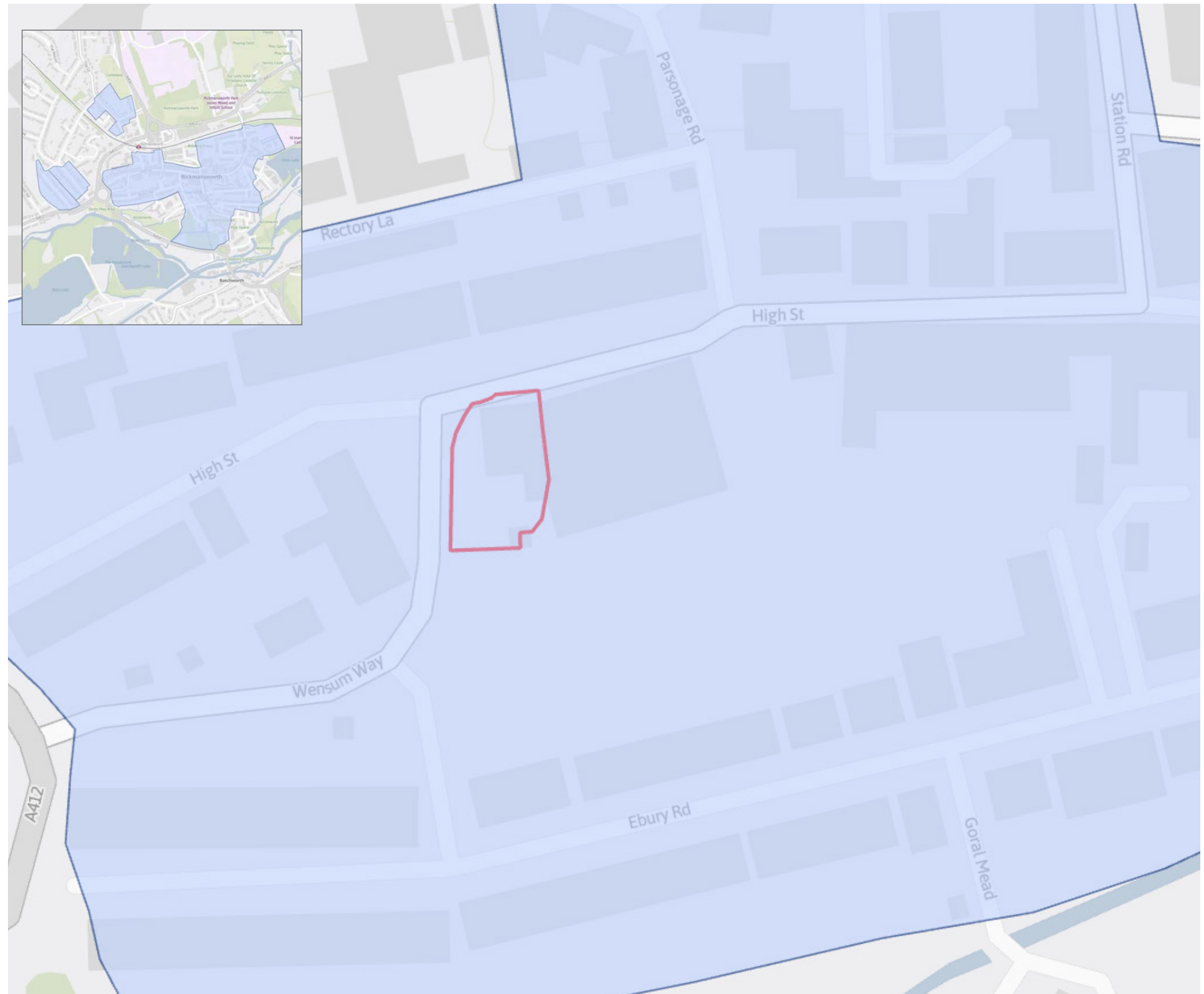


Figure 3.1 Site within Rickmansworth Conservation Area - inset: Rickmansworth Conservation Area

building with flar roof also sits to the rear. The roof of the main building is hipped and covered in red plain clay tiles, with a brick stack to each side plane.

Significance

Externally, the main body of the building retains some aesthetic value, in particular through the details such as the balanced facade to the front, retaining historic detailing including the bay windows at ground floor and the sash windows to the upper floors. The hipped roof together with the large brick stacks also provides input to the aesthetic value. However, the rear elevation has been heavily marred by the later extensions, which have both blocked elements of the ground and first floors and have also removed historic detailing and affected the original balanced facade.

There is some historic value, with the Western having been present since at least 1873, although it probably marginally pre-dates this, although the 1838 tithe apportionment records that the site was occupied by a cottage and garden. There is some further illustrative value through its representation of formal semi-Georgian architecture.

Setting

The setting of the Western varies, with the immediate surroundings of the High Street being dominated by the Marks and Spencers adjacent to the pub which makes no contribution to the significance of this non-designated heritage asset, whilst opposite are a series of terraces and semi-detached properties of late nineteenth century date which provide an appropriate historic context for the building. To the west lies an apartment block dating to the mid to late 1960s, which again makes no contribution to the significance of the building.

The rear of the pub is dominated by the small car-park and the modern brick garage, with the rear elevation of the Marks and Spencers forming the dominant backdrop, none of which makes any particular contribution to any of the heritage values of the pub.

Rickmansworth Conservation Area

Description and significance

The Rickmansworth Conservation Area was designated in 1974, and expanded in 1980, with a Conservation Area Appraisal being prepared in 1993

Whilst the Conservation Area Appraisal is over thirty years old, it still provides a good assessment of the character of the Conservation Area:

Rickmansworth was designated a Conservation Area in 1974 and extended in 1980 to include the Victorian development of the town.

Rickmansworth sits at the centre of a network of communication routes. The rivers Colne, Chess and Gade have watered the area and the landscape is therefore dominated by water and the nucleus of the town is enclosed by the Grand Union Canal to the south and the Metropolitan Line to the north.



Plate 3.1 The Western, High Street (front elevation)



Plate 3.2 Car-park to the rear of the Western

Due to these physical constraints the town still retains its medieval core based on the High Street and Church Street, although modern road schemes and their associated signage markings and street furniture have had a major and disruptive impact on the area.

The High Street and Church Street form the historic core of the town. A comparison between the 1839 Tithe map and the Conservation Area map illustrates High Street's dominance over the town plan. This has sadly been destroyed by the addition of Northway breaking up the original long winding nature of the street. Church Street curves around the present church which sits on the original site of the parish church and the route is lined with 16th and 17th century timber-framed buildings. Behind lies the Bury, the old Manor House of Rickmansworth.

The character of Rickmansworth is that of a typical small Hertfordshire town, surrounded by a network of communication routes of canal, railway and road which has enabled it to maintain a tight nucleus within which is a mixture of commercial, residential and industrial uses. The High Street is still the core of the commercial life of Rickmansworth, High Street East containing a mixture of residential and light industrial uses, whilst Church Street is a smaller quieter small-scale area.

At a more immediate level to the Site, whilst the northern side of High Street retains its nineteenth century dwellings (albeit some with unsympathetic alterations), the area is dominated by the Marks and Spencers supermarket and other elements such as the apartments on the western side of Wensum Way further detract from the overall special architectural and historic character of the Area.



Plate 3.3 View along Parsonage Road



Plate 3.4 Victorian dwellings on northern side of High Street



Plate 3.5 Victorian dwellings on northern side of High Street



Plate 3.6 View west along High Street



Plate 3.7 View east along High Street to the historic core



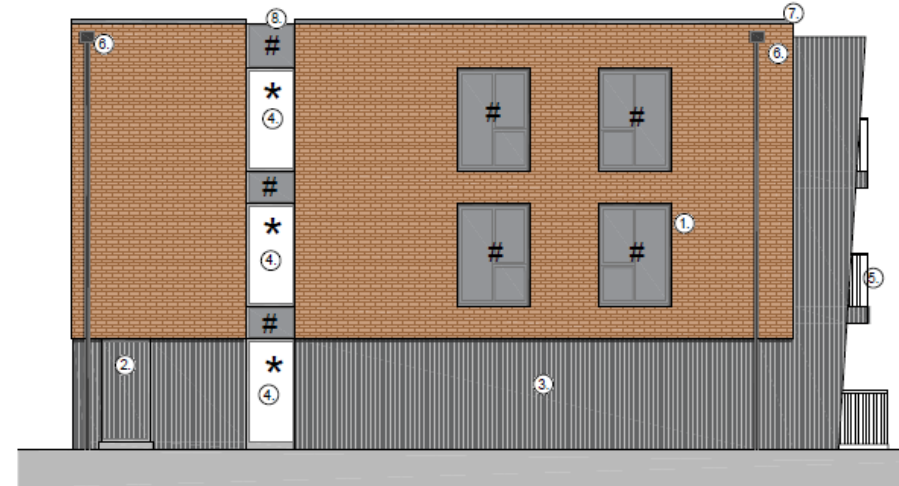
Plate 3.8 View to the historic core from the Western

4. Development Proposals

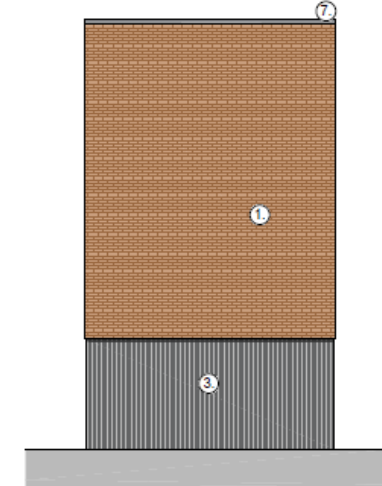
The proposals are for the development of a three storey apartment block on land currently forming part of the car-park of the Western, containing three 1 x bed apartments. The building is proposed to be in buff facing brickwork, with charred timber cladding at ground floor and matching charred timber doors, black aluminium framed windows and black steel railings to balconies.

The drawings referenced herein, produced by PLC Architects in September 2023 are as follows:

- 23.3442.100_P5
- 23.3442.101_P2
- 23.3442.102_P3
- 23.3442.103_P4
- 23.3442.104_P6
- 23.3442.105_P5



Proposed North Elevation



Proposed East Elevation



Proposed South Elevation



Proposed West Elevation

5. Assessment of Impact

This section will consider the impact of the proposals on the significance, or special interest, of the heritage assets identified in Section 3 of this assessment. Following the advice provided in Historic England's GPA3, the following attributes are considered for their effect on the significance of such assets:

The location and siting of development; the proximity of the Site to the asset; the position of the Site in relation to relevant topography and to key views to, from and across the Site and the asset; the form and appearance of development, its prominence, dominance, or conspicuousness and the potential for competition with or distraction from the asset; the dimensions, scale and massing, materials, architectural design of the Proposed Development; and the potential wider effects of the development, including any change to built surroundings and spaces, and to the general character of the surrounding area.

The Western

The significance of this pub lies in both its architectural and historic interest, with the former being evident through its architectural styles and details, in particular to the front elevation, and the large hipped roof and stacks, as well as its position in the road forming an important focal point. The illustrative value arises through its representation of architecture details such as the use of bay windows, as well as it being illustrative of a mid-nineteenth century public house. The modern extensions to the rear have been shown to make a minor negative effect on this significance, as has the adjacent supermarket, the car-park and the modern garage.

In terms of the development of the proposed development, the development of a new modern apartment block of a scale and massing appropriate to its location will see the modern garage be removed and the car-park improved in terms of landscaping. As such, there will be **a minor enhancement to the significance of this non-designated heritage asset.**

Rickmansworth Conservation Area

The significance of the Conservation Area has been illustrated through its architectural appearance and its historic interest, in particular through the retention of the historic core along Church Street and High Street, whilst the late nineteenth century developments resulted in the expansion of the Conservation Area, with the Site forming part of the mid-nineteenth century development. The Area thus has considerable aesthetic value, with its wide range of buildings, architectural styles and materials, whilst its illustrative value arises from its gradual development and the range of architectural styles in use throughout the area.

The proposed development is positioned in an area where views to the rear of the supermarket provide detriment to the conservation area, and considering the high quality design and appropriate scale and massing of the proposed building, such views will be greatly improved. Thus, **its significance will therefore be preserved from harm, and there will in fact be a very minor enhancement through the removal of unsympathetic views of the rear of the supermarket.**

6. Summary of Findings

This report has found that the significance of The Western lies in its aesthetic and illustrative value, primarily through its architectural detailing and as a focal point. The building will remain as an important focal point along both High Street and Wensum Way, whilst its architectural detailing will remain unscathed. The proposed development will provide a minor enhancement to the setting, and as such, its significance as a non-designated heritage asset will be preserved from harm.

In terms of the Rickmansworth Conservation Area, the special architectural and historic interest of the area has been shown to lie in its range of architecture, with its historic interest lying in its historic core, and through its representation of development of much of the area from the eighteenth century through to the late nineteenth century, with the Site forming part of the mid-nineteenth century development, although the car-park and views of the rear of the supermarket provide some detriment. The proposed development will result in a minor enhancement to its special character and interest, therefore meeting the requirements of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990

As such, considering there is no harm to any designated heritage assets identified as part of this assessment, the need to have special regard to the desirability to preserve, or keep from harm, the Rickmansworth Conservation Area, as set out at Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is met.

With regards to local planning policy, the proposed development has been shown to preserve the heritage assets, thus, the proposed development has been shown to meet the requirements set out within Policy CP12 of the Three Rivers Core Strategy Local Plan (2011) and Policy DM3 of the Three Rivers Development Management Policies Local Development Document (Adopted July 2013).

As such, and considering the great weight to be given to the conservation of designated heritage assets, this proposed development therefore accords with the policies set out in Section 16 of the NPPF.

In conclusion, there will be no harm arising from the proposed development on any of the identified heritage assets, and their respective significance will be preserved from harm. As such, there is no heritage reason for the application to be refused.

Bibliography

UK Parliament, *Planning (Listed Buildings and Conservation Areas) Act 1990*

UK Parliament, National Planning Policy Framework (2021)

UK Parliament, Planning Policy Guidance (2014)

The Three Rivers Core Strategy (2011)

The Three Rivers Development Management Policies Local Development Document (Adopted July 2013)

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

English Heritage, The Setting of Historic Assets (2017)

Historic England, The National Heritage List for England

Landmark Ordnance Survey historic mapping (1:10,000; 1,2500)

British History Online (www.british-history.ac.uk)

<https://opendomesday.org/>

<https://www.thegenealogist.co.uk/>

<https://pubwiki.co.uk/HertsPubs/Rickmansworth/WesternInn.shtml>

Appendices

A. Legislation, Planning Policy and Guidance

B. Detailed Methodology

A: Legislation, Planning Policy and Guidance

Overview of the decision-making process

The decision-making process of planning applications is within the role of the Local Planning Authority (LPA), and in certain cases the Secretary of State, which will have consideration of relevant legislation and planning policy at both national and local level. As such, this section will examine the relevant legislation and planning policies and guidance in relation to the Site's development proposals. A comprehensive assessment of these are outlined below.

The current regime recognises that planning applications should consider the potential impact of development proposals on heritage assets. This term includes: designated historic assets, which have a statutory designation (e.g. Listed Buildings and Conservation Areas) and non-designated historic assets, such as those compiled into a Local List by LPAs.

Legislation

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

Section 16(2) of the 1990 Act states that, when considering whether to grant listed building consent, a decision-maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

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

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

The term "preserve", within the context of Section 66, has been defined within *South Lakeland District Council v Secretary of State* [1992] 2 WLR 204, where it was held that the "desirability of preserving" creates a presumption against harmful changes, but not a presumption against any change - or more simply that "preservation" equates to leaving character or appearance unharmed. Furthermore, it was also held that where a development would not have any adverse effect on the character or appearance of that area, and it otherwise unobjectionable in planning terms, there should be no reason for its refusal.

The meaning and effect of these duties have been further considered by the courts, including the Court of Appeal decision in relation to *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137. 4.4 The Court agreed with the High Court's judgment that Parliament's intention in enacting Section 66(1) was that decision-makers should give "considerable importance and weight" to the desirability of preserving the setting of listed buildings.

The appeal decision for APP/H1705/A/13/2205929 adds further clarification as to the overall planning balance in the context of Section 66. The application for the

proposed development of 425 dwellings at Razor's Farm, Chineham, Basingstoke was called in by the Secretary of State for determination. The Secretary of State, like the Inspector, considered that considerable importance and weight is not synonymous with overriding importance and weight.

The Court of Appeal Judgment of *Williams v Powys County Council* ([2017] EWCA Civ 427) provides further clarification regarding the setting of listed buildings, and in particular on the issues of both inter-visibility and of co-visibility, and the potential relevance of visual relationships of heritage assets and their setting. *Linholm L.J.* recognised that, if a proposed development is to affect the setting of a listed building, there must be a distinct visual relationship of some kind between the two. However, the Judgment goes on to state that this does not mean that the mere possibility of seeing both the listed building and the development at the same time establishes that the development will affect the setting of the listed building.

The same Judgment, in considering concerns about impacts on setting of heritage assets, arising from consultation responses, also states that sometimes a consultee or an objector may have raised concern about the effect the development will have on the setting of a listed building but the decision-maker can properly take the view that there will be no such effect, or at least no harm.

In the Court of Appeal Judgment of *Jones v Mordue* [2015] EWCA Civ 1243, the Court held that, given that the relevant paragraphs (132-134) of the NPPF are to be read together and consecutively, they create a presumption in favour of the desirability to preserve the setting of a listed building or to preserve or enhance a Conservation Area, in line with the statutory requirements.

In the High Court Judgment of *Bedford Borough Council v Nuon UK Ltd* ([2013] EWHC 2847 (Admin) Mr Justice Kay states that, where there is substantial harm, then there is a presumption against granting consent – however, where the harm is less than substantial, it is simply a question of weighing that harm against the public benefits of the proposals. It further suggests that "substantial harm" is such as where "the impact on significance was required to be serious such that very much, if not all, of the significance was drained away".

The High Court Judgment of *Forge Field Society v Severnoaks District Council* ([2014] EWHC 1895 (Admin) sets out the "need for suitably rigorous assessment of potential alternatives" – in other words, where any harm is identified to the significance of a heritage asset, but there is a need for the type of development considered, and an alternative site on which such harm can be avoided all together, "this will add force to the statutory presumption in favour of preservation": in other words, if a different site can be identified, this will strengthen the presumption against the harm. However, whilst this presumption will be strengthened, this does not mean that refusal is justified; the requirement is then that the benefits must be shown to outweigh the identified levels of harm.

When considering the implications of Paragraph 14 of the NPPF, the High Court Judgment of *Forest of Dean v Gladman Developments Ltd* ([2016] EWHC 421 (Admin)) is the authority for the proposition that if harm is caused to the significance of a designated heritage asset, the tilted balance does not apply (by reason of Footnote 9), and provides precedent on the application of paragraph 14 of the NPPF (ie: the presumption in favour of development), and the two "limbs". This clarifies that, in undertaking the balancing exercise required by paragraph 134 (which itself takes account of the considerable importance and weight required by legislation), and where the public benefits have been weighed against (but not

necessarily outweighed by) the public benefits, the decision-maker is required to then assess the overall benefits of development are weighed against the collective adverse impacts identified within NPPF as a whole.

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

The NPPF (MHCLG, 2021)

The NPPF sets out the Government's planning policies for England and how these are expected to be applied. When determining Planning Applications, the NPPF directs LPAs to apply the approach of a presumption in favour of sustainable development; the 'golden thread' that is expected to run through the plan-making and decision-taking process. This is expected to apply unless this conflicts with other NPPF policies, inclusive of those covering the protection of designated heritage assets.

Section 12 'Achieving well-designed places' (NPPF Paragraphs 126-136) emphasise on the importance of creating high quality, beautiful and sustainable buildings and places, with good design a key aspect of sustainable development. NPPF paragraph 130 reinforces the importance of good design in achieving sustainable development by ensuring that development proposals:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Section 16 'Conserving and Enhancing the Historic Environment' (NPPF Paragraphs 189-208), relates to development proposals that have an effect on the historic environment. This is the guidance to which LPAs need to refer to when setting out a strategy in their Local Plans for the conservation and enjoyment of the historic environment. It is noted that heritage assets should be conserved in a manner

appropriate to their significance.

In Annex 2: Glossary of the NPPF are the relevant terms relating to the historic environment. For the purposes of this report, the following are important to note:

Heritage Asset is a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions. These include designated heritage assets and assets identified by the local planning authority; and

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

When determining applications for development proposals, LPAs should require applicants to describe the significance of the identified heritage assets affected and the contribution made by their setting. The level of detail provided should be proportionate to the significance of this heritage asset, and sufficient to understand the impact of development proposals on that significance (NPPF Paragraph 194).

The NPPF Paragraph 197 advises LPAs to consider the following points when drawing up strategies for the conservation and enjoyment of the historic environment, and when determining planning applications:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

NPPF Paragraphs 199-208 consider the impact of development proposals on the significance of a heritage asset. Great weight should be given to the heritage asset's conservation, and that the more important the heritage asset, the greater this weight should be applied (NPPF Paragraph 199).

NPPF Paragraph 202 advises that, where development proposals will cause 'less than substantial harm' to a designated heritage asset's significance, this harm should be weighed against the public benefits, including securing its optimum viable use.

National Planning Guidance

Planning Practice Guidance (PPG) (DCLG, March 2014) (as amended)

This guidance has been adopted in support of the NPPF and reiterates the importance of conserving heritage assets in a manner appropriate to their significance.

Conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. The neglect and decay of heritage assets is best addressed by ensuring that they remain in an active use consistent with their conservation.

Key elements of the guidance relate to assessing harm. An important consideration should be whether development proposals adversely affect a key element of the heritage asset's significance:

'it is the degree of harm, rather than the scale of development that is to be assessed'.

The level of 'substantial harm' is stated to be a high bar, which may not arise in many cases. Whether development proposals cause substantial harm will be a judgment in the decision-taking process, having regard to the circumstances of the case and by applying the relevant NPPF policies.

Such harm may arise from works to the heritage asset or from development within its setting. Setting is defined as:

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

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

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

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

'considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment' (Paragraph 25).

Historic Environment Good Practice Advice in Planning Notes

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

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

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

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

- Understand the significance of the affected assets;
- understand the impact of the proposal on that significance;

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

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

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

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

This advice note focuses on the management of change within the setting of heritage assets. This guidance updates that previously published by English Heritage (The Setting of Heritage Assets 2011) in order to ensure that it is fully compliant with the NPPF and is largely a continuation of the philosophy and approach of the 2011 document. It does not present a divergence in either the definition of setting or the way in which it should be assessed.

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

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

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

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

Local Plan Policy

The **Three Rivers District Council** provides the planning policy context for the Site, with several documents providing the planning policy: the Core Strategy (Adopted October 2011); and the Development Management Policies Local Development Document (Adopted July 2013). The following policies are pertinent to the historic environment, and are relevant to this site:

Core Strategy (2011)

CP12 Design of Development

In seeking a high standard of design, the Council will expect all development proposals to:

- Have regard to the local context and conserve or enhance the character, amenities and quality of an area
- Conserve and enhance natural and heritage assets
- Protect residential amenities by taking into account the need for adequate levels and disposition of privacy, prospect, amenity and garden space
- Make efficient use of land whilst respecting the distinctiveness of the surrounding area in terms of density, character, layout and spacing, amenity, scale, height, massing and use of materials
- Build resilience into a site's design taking into account climate change (for example flood resistant design)
- Use innovative design to reduce energy and waste and optimise the potential of the site
- Ensure buildings and spaces are, wherever possible, orientated to gain benefit from sunlight and passive solar energy
- Design out opportunities for crime and anti-social behaviour through the incorporation of appropriate measures to minimise the risk of crime and create safe and attractive places
- Incorporate visually attractive frontages to adjoining streets and public spaces
- Ensure all appropriate frontages contain windows and doors that assist informal surveillance of the public realm
- Use high standards of building materials, finishes and landscaping; also provide/contribute towards street furniture and public art where appropriate

l) Ensure the development is adequately landscaped and is designed to retain, enhance or improve important existing natural features; landscaping should reflect the surrounding landscape of the area and where appropriate integrate with adjoining networks of green open spaces

m) Make a clear distinction between public and private spaces and enhance the public realm

n) Ensure that places, spaces and buildings are accessible to all potential users, including those with mobility difficulties

o) Provide convenient, safe and visually attractive areas for the parking of vehicles and cycles without dominating the development or its surroundings

p) Be durable and, where practical, buildings should be capable of adapting to other uses and functions in order to ensure their long-life.

Detailed design guidance and standards will be provided in the Three Rivers Design Guide Supplementary Planning Document.

Development Management Policies Local Development Document (Adopted July 2013)

DM3 The Historic Built Environment

a) When assessing applications for development, there will be a presumption in favour of the retention and enhancement of heritage assets and to putting heritage assets to viable and appropriate uses to secure their future protection. Applications will only be supported where they sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment.

b) Listed Buildings

The Council will preserve the District's Listed Buildings and will only support applications where:

- The extension/alteration would not adversely affect its character as a building of special architectural or historic interest both internally or externally or its wider setting
- Any change of use would preserve its character as a building of special architectural or historic interest and ensure its continued use/viability. Applications involving the demolition of a Listed Building will only be granted in wholly exceptional circumstances.

c) Conservation Areas

Within Conservation Areas development will only be permitted if the proposal:

- Is of a design and scale that preserves or enhances the character or appearance of the area
- Uses building materials, finishes, including those for features such as walls, railings, gates and hard surfacing, that are appropriate to the local context
- Retains historically significant boundaries, important open spaces and other elements of the area's established pattern of development, character and historic

value, including gardens, roadside banks and verges

iv) Retains and restores, where relevant, traditional features such as shop fronts, walls, railings, paved surfaces and street furniture, and improves the condition of structures worthy of retention

v) Does not harm important views into, out of or within the Conservation area

vi) Protects trees, hedgerows and other significant landscape features and incorporates landscaping appropriate to the character and appearance of the Conservation Area

vii) Results, where relevant, in the removal of unsympathetic features and the restoration or reinstatement of missing features.

d) Within Conservation Areas permission for development involving demolition or substantial demolition will only be granted if it can be demonstrated that:

i) The structure to be demolished makes no material contribution to the special character or appearance of the area; or,

ii) It can be demonstrated that the structure is wholly beyond repair or incapable of beneficial use; or

iii) It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area.

e) The Council will not normally grant consent for the demolition of a building in a Conservation Area unless permission has been granted for redevelopment of the site.

f) Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.

g) The Council will only permit development proposals including solutions to shop front security and/or use of standardised shop front designs, fascias or advertisement displays in a Conservation Area if they:

i) Are sympathetic to the character and appearance of the Conservation Area;

ii) Respect the scale, proportions, character and materials of construction of the upper part of the building and adjoining buildings and the street scene in general;

iii) Incorporate traditional materials where the age and character of the building makes this appropriate.

Generally, totally internally illuminated fascias or projecting signs will not be permitted. The Council will also not support applications for additional signs that would result in a proliferation of, and excess amount of, advertisement material on any individual building or group of buildings.

h) Locally Important Buildings

The Council encourages the retention of Locally Important Buildings. Where planning permission is required for the alteration or extension of a Locally Important Building, permission will only be granted where historic or architectural features are retained

or enhanced.

i) Historic Parks and Gardens

Planning permission will not be granted for proposals that would cause unacceptable harm to historic parks or gardens (both registered and unregistered), their settings or public views into, out of, or within them. Applicants are required to submit a Historic Landscape Assessment prior to the determination of the application. This may include an archaeological assessment if located within an area of archaeological importance.

j) Archaeology

Where an application site includes, or is considered to have the potential to include, heritage assets with archaeological interest, it must be accompanied by an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation. There is a presumption against any harm to Scheduled Monuments and heritage assets with archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments. Where the loss of the whole or a material part of a heritage asset's significance (archaeological interest) is justified, planning conditions will be included in any permission to ensure that an adequate record is made of the significance of the heritage asset before it is lost. This will be secured through an archaeological written scheme of investigation (WSI) which must include provision for appropriate publication of the evidence.

B: Methodology

In order to assess the impact of proposed development on the significance of each identified heritage asset, the significance of each asset is assessed against a range of "heritage values". Whilst a variety of different sources identify a wide range of such values, these are largely similar, and as such the values set out by Historic England (formerly by English Heritage, 2008), forming the most proportionate and inclusive values, are utilised herein.

Conservation Principles (EH, 2008)

Conservation Principles outlines Historic England (formerly English Heritage) approach to the protection and management of the historic environment as a whole. While primarily intended to ensure consistency in HE's own advice and guidance, the document is recommended to LPAs, property owners, developers and their advisors to ensure that all decisions about change affecting the historic environment are informed and sustainable.

The guidance describes a range of historic values which enables the significance of assets to be established systematically, with the four main 'historic values' being:

Evidential value: which derives from those elements of an heritage asset that can provide evidence about past human activity, including its physical remains or historic fabric;

Historical value: which derives from either the illustration of a particular aspect of past life, or through the association with a notable family, person, event or movement;

Aesthetic value: which derives from the ways in which people draw sensory and intellectual stimulation from an heritage asset; and

Communal value: which derives from the meanings of a heritage asset for the people who relate to it, or for whom it figures in their collective experience or memory. The British Standard for Conservation (2015)

The British Standard states that "significance" represents a public interest, and the planning system, and the policy and legislation which support it, reflects this. It provides a list of twenty-five (non-exhaustive) values which may be considered when assessing significance. The Guide goes on to state that heritage has cultural, social, economic and environmental values, and that a wide range of factors can contribute to the significance of historic buildings, examples of which examples include:

a. attributes relating to the physical and spatial properties of a historic building (aesthetic, historic and evidential value):

1) the original design of the historic building and how it has changed over time, including material patina;

2) The materials used in construction; and

3) The presence of archaeological information in remains above and below ground (evidential value);

b. characteristics in relation to the context of the historic building;

1) how a historic building relates to its surroundings (e.g. other buildings, townscape or the wider environment); and

2) how a historic building relates to similar buildings;

c. characteristics relating to wider associations—(communal value/ associative

value):

1) the use of the historic building over time and its connections with a significant person, family or community;

2) associations with historic, scientific or artistic events or works (e.g. literature, paintings); and

3) social significance, and the historical, cultural, economic, political and social factors that influenced the design.

Approach to Assessment of the Setting of Heritage Assets

The following assessment has been undertaken following Historic England guidance set out in its *Historic Environment Good Practice Advice in Planning: The Setting of Historic Assets (2nd Ed.) (2017)* (GPA3), as well as identifying the elements which make up significance, as set out in English Heritage's *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008)* (Conservation Principles): Aesthetic, Historic; Communal; and Evidential. The 5-step process set out in GPA3 requires an analysis of the setting of heritage assets, and the degree to which setting contributes to the significance of the heritage asset. It also requires an assessment of how such contribution may be altered through proposed development. However, prior to this Setting Assessment being undertaken, and in order to fully understand the significance of a heritage asset, a proportionately-detailed assessment of the heritage values as set out in Conservation Principles should be undertaken, in order to inform the Setting Assessment.

In order to understand the extent and contribution of the setting of each historic asset identified as requiring assessment, and the potential impact of proposed development on setting and significance, the 5-step process set out in Historic England's *The Setting of Historic Assets* has been used. The five steps are:

Step 1: Identify which heritage assets and their settings are affected.

A search of the Historic Environment Record (HER), together with the National Heritage List (NHL) and the Council's website provides an initial list of potential heritage assets to be considered, including listed buildings, conservation areas, and other national or local heritage designations which may need to be considered. This is augmented with a site visit and additional research, where other buildings and structures not included in any of the above, but potentially considered as non-designated heritage assets, can be identified. Each heritage asset is visited, as far as public access allows, and its surroundings are examined in order to understand the degree to which elements of the surroundings allow for the building to be experienced or better understood, therefore identifying its setting, as defined within the NPPF.

Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.

In order to undertake this stage, the significance of the heritage assets has to be understood, whether designated or non-designated. Although there is no proscriptive method for assessing significance, this Appraisal utilises the heritage values¹ set out in Conservation Principles, Policies and Guidance (English Heritage, 2008), and considers each heritage asset against these values. Whilst the British Standard suggests a variety of additional potential values, the ones set out by in Conservation Principles are generally recognised as appropriate and proportionate

values to assess. Once each heritage asset has been assessed against the five heritage values, and its significance is understood, an assessment of the contribution of setting to this significance can be undertaken. This is achieved through assessing each element of setting against the heritage values of the asset, and identifying whether it a positive, negative or neutral contribution, if any—and if so, identifying which heritage values it contributes to and how. The final stage is to identify the relative extent of significance arising from setting, in comparison to other sources of heritage value.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.

GPA3 sets out suggested, although non-exhaustive, potential attributes of a development which may affect the setting of heritage assets, which include location and siting of the development; the form and appearance of the development; other effects such as planting, lighting, noise, change to general character, and changes to skylines or built surroundings and spaces; permanence of the development; and longer term or consequential effects of the development. These are used as a guide and a basis from which to assess how a development may alter a particular element of setting, and to understand which heritage values the proposed development may impact upon. Details of the design of the proposed development will often vary, and will range from initial concepts through to detailed plans and elevations, verified photographs and photomontages. Where details are lacking, assumptions based on professional judgement and knowledge can be used to undertake assessment—where this is the case, this will be set out clearly in the report, and caveated accordingly. Where harm is identified to the significance of a designated heritage asset, the nature of harm is explained, and the extent of harm to significance is set out in terms of substantial harm, or in degrees of less than substantial harm, as appropriate. Where harm is identified to the significance of a non-designated heritage asset, the nature of harm is set out in terms of high, moderate, low or negligible. This is in recognition that the NPPF differentiates the extent of weight to be afforded to the conservation of a heritage asset, dependant on its status of designation. Where benefit is identified, this is identified in terms of substantial, moderate, low or negligible, for the purpose of clarity.

Step 4: Explore Ways to Maximise Enhancement and Avoid or Minimise Harm.

Although this Step generally relates to identification and assessment of potential impact during design, and the subsequent mitigating harm through re-design, for the purposes of this assessment, this Step will be used to identify areas of where there is heritage benefit within the scheme, and/or elements of mitigation integral to the design (for instance, landscaping, or repairs to a listed building). In order to be able to undertake a quantitative balancing exercise between heritage benefit and heritage harm in the next Step, benefit is referred to in terms of substantial, moderate, low or negligible.

Step 5: Make and Document the Decision and Monitor Outcomes.

As this final stage the guidance states that it is good practice for the results of the As this final stage is explicitly for the decision-maker, this Step is not undertaken within this assessment. However, as any decision will be based on the compliance of the proposed scheme with legislation and policy at both national and local level, this Step is used to assess whether the scheme is in line with the requirements stemming from such. A synopsis of the identified impacts on each heritage asset is provided, followed by an assessment of cumulative harm on the surrounding historic built environment. Where both heritage harm and heritage benefits are

identified, a balancing exercise of these is undertaken. Finally, the assessment will identify whether the proposed scheme is compliant with relevant legislation and policy, and whether any additional balancing of harm against public benefit is required. This final Step will take account of all relevant and up-to-date case-law as it pertains to the scheme, as well as the planning history of the site where relevant, including (but not exclusively) any previous applications, appeals, together with any formal or informal pre-application advice from both the Local Planning Authority and from Historic England.

The appendices contain background information and reference material, including historic mapping, list descriptions, location of heritage assets, photographs, and all relevant paragraphs of legislation and relevant policies. This should all be referred to throughout these five steps.
