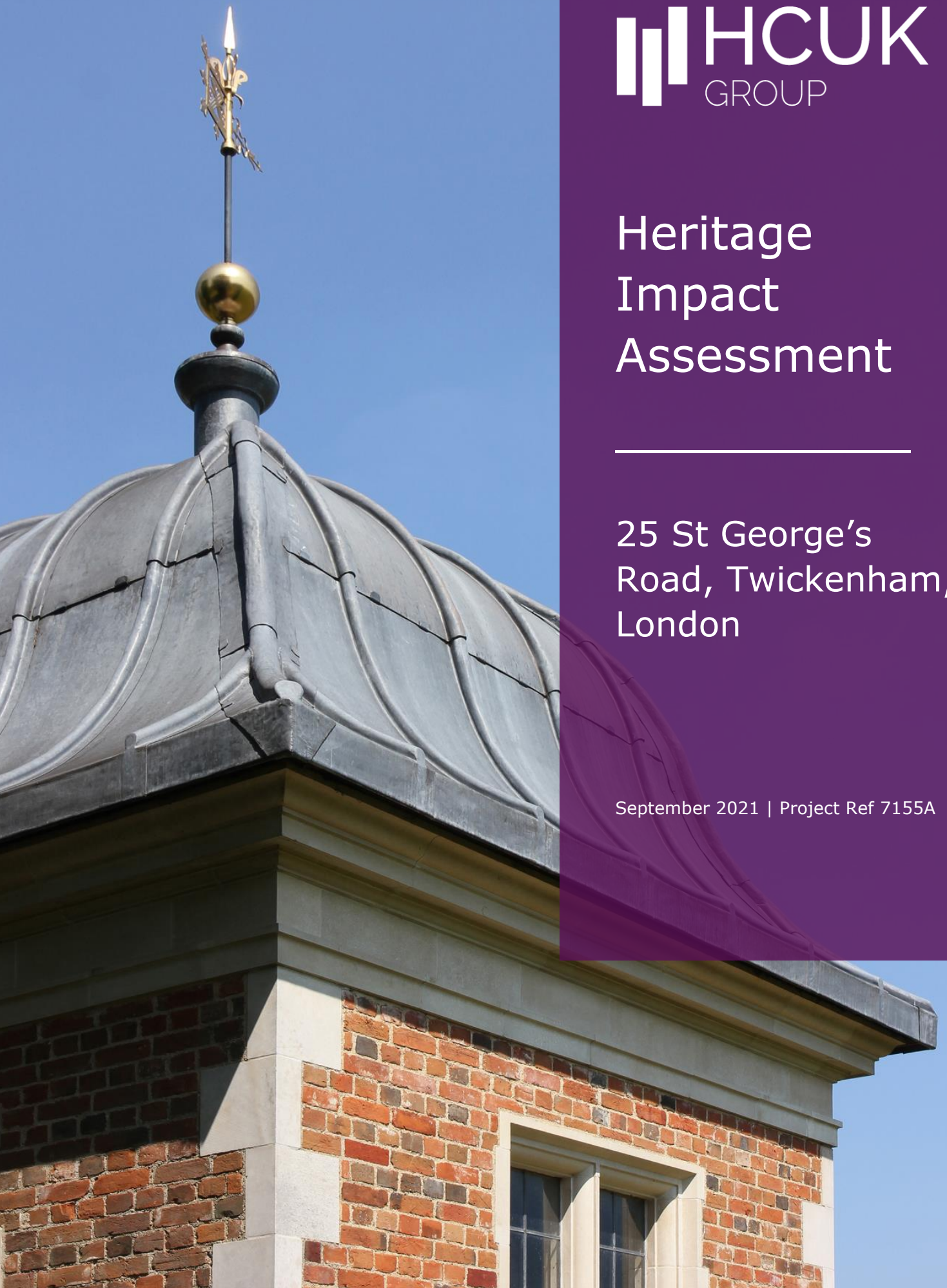




Heritage Impact Assessment

25 St George's
Road, Twickenham,
London

September 2021 | Project Ref 7155A



HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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1. Introduction

- 1.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Matthew and Karen Gilbert, owners of 25 St George's Road, Twickenham. It relates to an application for planning permission for the extension and alteration of the residential dwelling which is located within the St Margaret's Estate Conservation Area.
- 1.2** The site (**Figure 1 and 2**) is located on the eastern side of St George's Road in Twickenham, in the Royal Borough of Richmond upon Thames (LBR hereafter). The building appears to date to c.1938-1959 and is neither a statutorily listed or locally listed (also known as a Building of Townscape Merit) building. As such, the primary consideration of this report is the effect of the proposed development on the significance of the St Margaret's Estate Conservation Area.
- 1.3** In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2021) this statement describes the significance of the conservation area as a designated heritage assets.



Figure 1: Front elevation of 25 St George's Road, the application site



Figure 2: Site location plan

Relevant Background & The Proposals

1.4 Building upon previously consented applications on the site¹, in June 2021 an application for various alterations was submitted to LBR (LPA ref: 21/2205/HOT). The description of development read:

"Demolition of existing two-storey rear extension and construction of single-storey and first floor rear extensions and new bay window, extension of roof and the raising ridge height of roof, installation of rooflights, replacement windows, and demolition and part replacement of existing garage"

1.5 The application was refused on 24 August 2021 for a single reason for refusal which read:

"The proposed rear dormer and the increase in height of the roof ridge by reason of their inappropriate design, scale, bulk and mass would result in an unsympathetic form of overdevelopment that would fail to harmonise with the existing house No.25 St Georges Road or its adjoining neighbour No. 23 St"

¹ LPA refs: 19/1288/HOT and 18/3955/HOT

Georges Road. It would fail to respect the character and appearance of the St Margarets Estate Conservation Area or the St Margarets Estate Village Character Area. The rear dormer and the increase of the roof ridge would be incongruous features when viewed by neighbouring properties to the detriment of their visual amenity, in particular No. 23 St Georges Road. The scheme is therefore contrary to, in particular, National Planning Policy Framework (2021) Paragraph 199, 202, LBRUT Local Plan (2018) Policies LP1, LP3, LP8 and the aims and objectives in the House Extensions and Alterations SPD, the St Margarets Village Planning Guidance SPD 2016 and the St Margarets Estate Conservation Area Statement No. 19.”

1.6 The officer’s report provided further clarity on the Council’s position noting:

“As noted above, the current proposals seek to raise the roof by a metre. This is a significant enlargement. This would greatly alter what remains of the historic proportions of this post war building with the roof now forming a prominent feature in the street scene.

As discussed above, a fairly large rear dormer to the rear roof slope is proposed which will not feature any windows. This addition would appear as highly incongruous and out of place on the original building.”

1.7 In direct response to officer comments proposals have been amended as follows:

- The ridgeline is proposed to be raised by 0.75m. This a reduction from the 1m proposed as part of the refused scheme but it should be noted that, under the 2019 consent (LPA ref: 19/1228/HOT), the Council accepted raising the height of the ridgeline in principle when consent was granted for a 0.2m increase meaning the current application seeks only a 0.55m increase from the consented position;
- The rear windowless dormer has been removed.

1.8 All other aspects of the proposed development, which did not raise concerns from LBR officers, remain consistent with the refused scheme.

1.9 The proposed development is based on a thorough understanding of the character, appearance and significance of the St Margaret’s Estate Conservation Area and seek

to enhance the functionality of the application site as a dwelling while being sensitive to the area's unique heritage values.

Purpose of this Statement

- 1.10** The purpose of this document is to assist with the determination of the application by informing the decision takers on the effects of development on the historic built environment. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised.
- 1.11** Specifically, this report assesses the significance of the St Margaret's Estate Conservation Area (including any contribution of the application site) and the capability of this assets to absorb change without causing harm to their significance. This is followed by an appraisal of the effect of the proposed works upon that significance. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the National Planning Policy Framework (NPPF) 2019 and local planning policy.
- 1.12** The heritage assets affected have been observed and assessed by the author following a site visit made in good weather.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a conservation area when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of such an asset and there is a strong presumption against the grant of permission for development that would harm its heritage significance.²
- 2.2** For the purposes of this statement, preservation equates to an absence of harm.³ Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.⁴
- 2.3** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.4** The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at **Appendix 1**.
- 2.5** Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph

² Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

³ South Lakeland v SSE [1992] 2 AC 141.

⁴ Conservation Principles, 2008, paragraph 84.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

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

2.6 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.7 Richmond's Local Plan was adopted in July 2018 and replaced previous policies contained within the Core Strategy and Development Management Plan. The plan sets out the policies and guidance for the development of the borough over the next 15 years.

2.8 **Policy LP 1 Local Character and Design Quality:** This policy notes that the Council will require all development to be of high architectural and urban design. To ensure development respects, contributes to and enhances the local environment and character, the policy notes that the following will be considered when assessing proposals:

- Compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
- Sustainable design and construction, including adaptability, subject to aesthetic considerations;
- Layout, siting and access, including making best use of land;
- Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;

- Inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
- Suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site

2.9 **Policy LP 3 Designated Heritage Assets:** This policy notes that the Council will require all development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. The policy provides a series of criteria which proposals must meet. Of relevance these note that proposals should give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset and that proposals in a conservation area are required to preserve and, where possible, enhance the character or the appearance of the conservation area.

2.10 The London Plan 2021 is the spatial development strategy for greater London and as such a piece of relevant planning policy. Of specific relevance is policy HC1 Heritage Conservation and Growth which notes that "*Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.*"

3. Statement of Significance

- 3.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF. In accordance with paragraph 189 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 3.2** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an assets significance. Understanding the significance of any heritage asset affected and any contribution made by their setting (paragraph 189 of the NPPF) is therefore fundamental to understanding the scope for and acceptability of change

St Margaret's Estate Conservation Area

- 3.3** The St Margaret's Estate Conservation Area was first designated on the 2 November 1971 and was subsequently extended in June 1988, November 2005 and January 2011. The conservation area is situated to the west of Twickenham Bridge and straddles the Chertsey Road. To the east are the Richmond Riverside Conservation Area and Old Deer Park Conservation Area.
- 3.4** The area now forming the conservation area was once waste lands before Twickenham Park was created. This park went on to be known as St Margaret's with a house of the same name built in c.1805. While the house was demolished in the 1930s the name of St Margaret survives.
- 3.5** The Conservative Land Society purchased the St Margaret's estate following the advent of the railway in the mid 19th century. Individual plots were sold by the

society and plot sizes were established as sufficient to qualify owners to vote but frequently exceeded this minimum requirement. While some 20th century development has been introduced the originally intended sense of spaciousness remains evident and well established with gaps between each house having a particular significance to the entire group, allowing glimpses of the gardens behind the houses. This is enhanced by the typically mature and well-tended front gardens of buildings along St Peter’s Road.

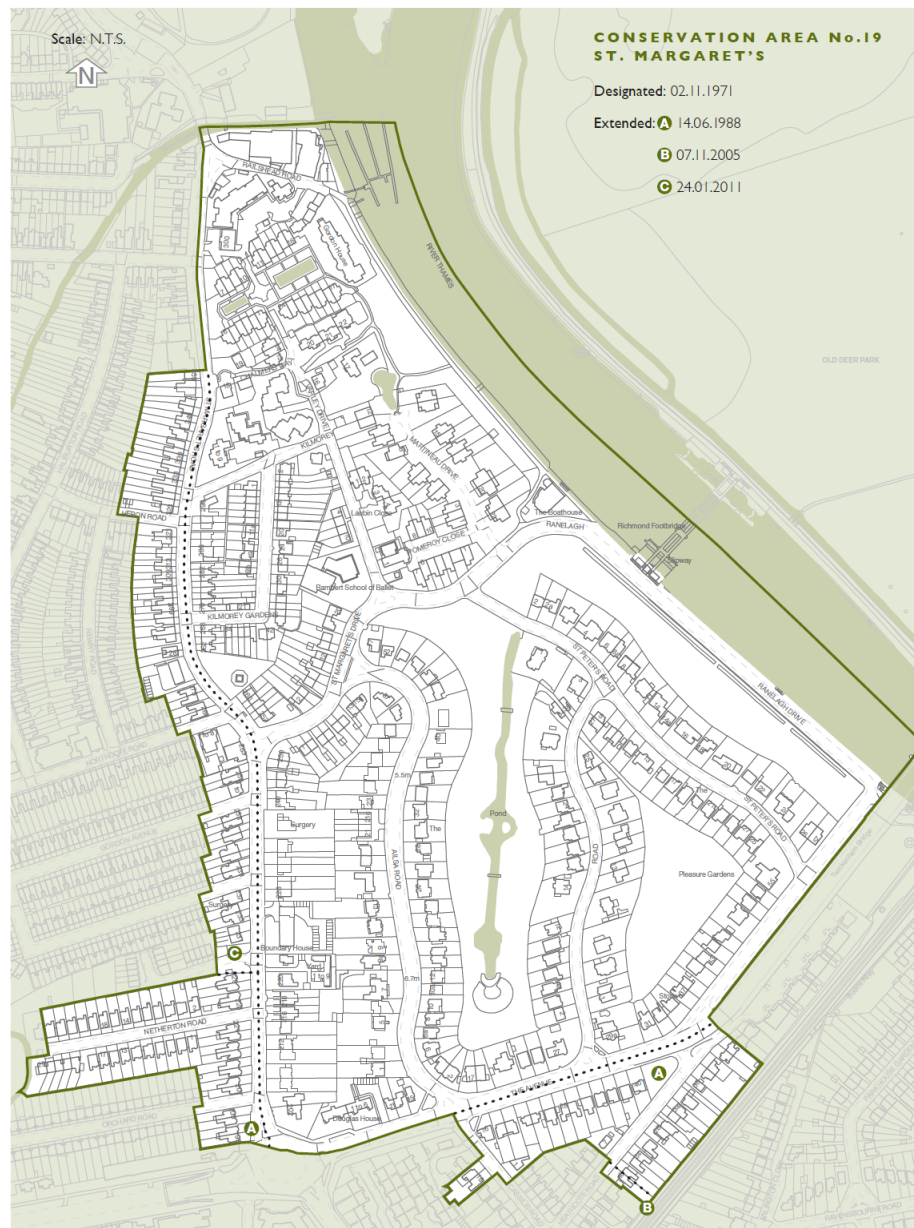


Figure 3: St Margaret’s Estate Conservation Area Map © London Borough of Richmond

3.6

Plot owners were responsible for the design of their own houses and as a result there is an eclectic mix of architectural styles in the area. Some plots remained unoccupied and, over time, became double plots. This mix of architectural styles typically includes high quality domestic architecture from the mid 19th century to the 1930s which the Conservation Area Statement describes as “*an eclectic mix from Victorian to Bauhaus*”. The mix of styles contributes to the rich and varied, but mostly traditional architectural character of the area. Buildings are typically detached though some semi-detached structures are present.



Figures 4 and 5: Examples of varied architecture present along St George's Road

3.7

The predominant building material in the area is brick with gault, red and London Stock bricks present. Though stucco is also a common feature of the street scene this is typically restricted to buildings' front elevations and detailing. Buildings within the conservation area take reference from the Gothic and Italianate styles and common detailing includes eaves brackets, band courses and architraves with porches and verandas common in timber and iron. The roof scape of the conservation area is characterised by hipped roofs with large and decorative chimneys with some dormers present, typically to the rear elevation of roof slopes.



Figures 6 and 7: Examples of varied architecture present along St George's Road



Figure 8: Example of varied architecture present along St George's Road

3.8 As identified by the Conservation Area Statement the distinctive character of the area derives from the way in which it was developed as a single estate in the park of St Margaret's House (now demolished). The conservation area is entirely residential in character and the scale, form and appearance of buildings within its boundary reinforce this domestic character.

3.9 The numerous pleasure gardens within the conservation area are an important part of the area's established character and appearance. They contribute to the suburban green and spacious character of the area and provide a rural backdrop to individual buildings and the River Thames.

3.10 Alongside its architectural and historic interest, the area is also of known archaeological interest given its location to the Thames and past occupation of the site.

3.11 Overall, the character and significance of the area is summarised by the Conservation Area Statement as deriving from:

"Grandiose villas within appropriately large gardens; The abundance of greenery and mature planting; The relationship of spaces between properties affording glimpses of the large communal gardens beyond; Privacy and enclosure provided by walled gardens; The vicinity of the River Thames; and An idiosyncratic mix of property styles."

3.12 Within the Conservation Area Statement, a number of pressures faced by the conservation area are listed. One is detailed as *"loss of traditional architectural features and materials due to unsympathetic alterations"*. Similarly, a number of opportunities for enhancement are detailed. Specifically, in reference to this application opportunities are detailed as preservation, enhancement and reinstatement of architectural quality and unity.

Contribution of the site to the St Margaret's Estate Conservation Area

3.13 The existing building of the application site, 25 St George's Road, was constructed during the mid 20th century between c.1938 and 1959 and is one of the few examples of later 20th century infill development within the conservation area. It was constructed on a narrow triangular corner plot which was left undeveloped throughout the late 19th and early 20th century while the surrounding area was built up, potentially due to the constraints of the site's shape.

3.14 25 St George's Road is of no specific architectural or historic interest given its later date and simplistic form and appearance and has not been identified as a Building of Townscape Merit by LBR. However, the structure sits relatively unassumingly within its surroundings as a result of its limited visual presence and height and darkly coloured (brown brick) front and side elevations.



Figures 9 and 10: Front (left) and side (right) elevation of the application site



Figures 11 and 12: Views of the rear elevation and later rear extensions of the application site

3.15

As such, when considered holistically the building makes a neutral or slight positive contribution to the character and appearance of the conservation area. However, any contribution to the conservation area is, based on professional experience, wholly limited by virtue of:

- The building's late date which contrasts with those in its immediate surroundings (here built form tends to date from the mid 19th to early 20th centuries);
- The building's standardised form and character. The building is neither architecturally interesting nor unusual for its period and does not possess any group value with nearby dwellings; and
- The poor quality rear additions and extensions which are part of at least two phases of uncoordinated extension. In particular these include a flat roofed side/rear extension and a rear bathroom extension (1980s) which features a

cantilevered tile hung first floor portion which, to a degree, hangs over the rear boundary wall (**Figures 10-12**). Due to the location of the building and its siting within its plot, these additions are highly visible from St George's Road and the private access lane to the pleasure grounds.

3.16 The limited contribution of the building appears to be supported by the LBR. In 2000 LBR added numerous buildings on St George's Road and within the conservation area to the local list of Buildings of Townscape Merit due to their "aesthetic value and positive contribution to the [conservation] area".

3.17 As shown on the proposals map (replicated overleaf at **Figure 13**), no.25 was one of the few buildings on the street which was not included as a BTM suggesting that the building is not, in LBR's view, of sufficient aesthetic value or positive contribution to the wider area to warrant individual identification.

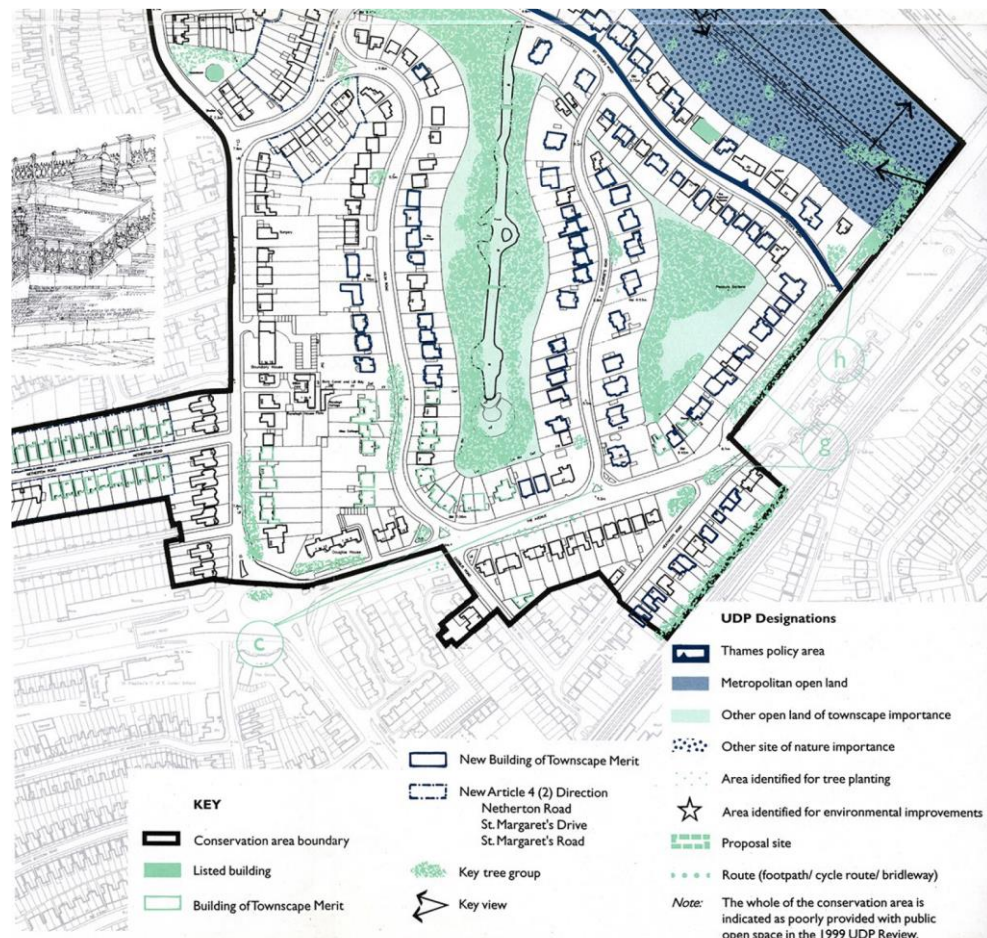


Figure 13: Extract from LBR's Proposal Map for the St Margaret's Estate Conservation Area, the application site is circled

4. Heritage Impact Assessment

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

Impact Assessment

4.2 As identified in the Introduction, current proposals have sought to directly address officer concern regarding the increase in ridge height and presence of the rear dormer which resulted in the previous 2021 application being refused. Specifically proposals have reduced the increased ridge height by 0.25m (to an increase of 0.75m) and the omission of the rear windowless dormer window.

4.3 Other changes proposed as part of the refused application were not identified as causing harm to the significance of the conservation area and remain consistent with the earlier application. These include the extension of the consented ground floor addition to align with the new extension at no.23, the reduction in the footprint of the garage, various elevational changes and changes to landscaping and boundary treatments.

4.4 All proposed changes included within this application are considered under the relevant subheadings below alongside an appraisal of their effects on the significance, character and appearance of the St Margaret's Conservation Area.

Increase of the Roof's Ridgeline

4.5 As noted above, proposals seek to increase the existing ridgeline of the roof at 25 St George's Road by 0.75m⁷ (a reduction from the refused application of 0.25m) to accommodate an additional bedroom and ensuite at this level of the building. As

⁷ As noted in the Introduction, under the 2019 consent (LPA ref: 19/1228/HOT), the Council accepted raising the height of the ridgeline in principle when consent was granted for a 0.2m increase meaning the current application seeks only a 0.55m increase from the consented position.

noted above, the blind dormer to the rear roof slope has now been omitted but, as previously proposed, the development includes new rooflights to the front and rear slopes.

4.6 In considering changes to the roof structure of 25 St George’s Road, it is relevant to remember that the application site is not a heritage asset in its own right. The primary focus of consideration must be the effect of the scheme on the significance of the St Margaret’s Estate Conservation Area as a whole.

4.7 The wholly minor increase of the roof line in comparison to the scale of the building as a whole (as demonstrated by the elevation drawings, replicated at **Figure 14 and 15**) would be entirely in keeping with and reflect of the character of the wider area which includes a variety of often steeply pitched roofs. While increasing the height of the building, the modest increase proposed alongside its existing notably smaller scale means that 25 St George’s Road would remain demonstrably subservient in scale to the adjacent building, no. 23.



Figure 14: Proposed front elevation showing the wholly minor increase in ridge height at the application site

4.8 Importantly, the extension of the roof in this manner would also have no bearing on the overall aesthetic value of building or its slight positive contribution to the St Margaret’s Estate Conservation Area. It would not, as suggested in the officer report for the recently refused application ‘greatly alter what remains of the historic

proportions’ of the building and would clearly not form ‘a prominent feature in the street scene’.

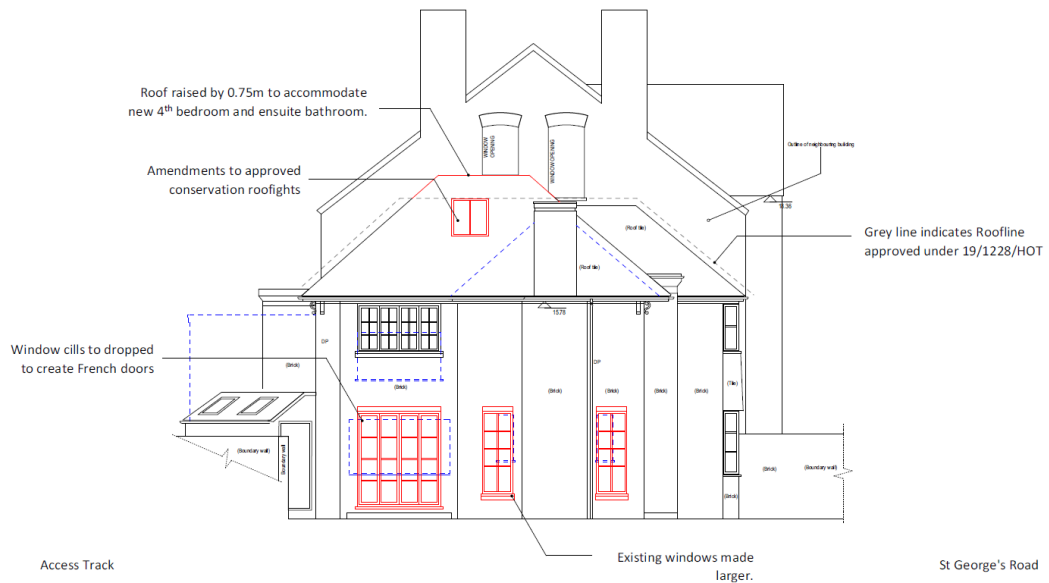


Figure 15: Proposed side elevation showing the wholly minor increase in ridge height at the application site and the way in which the building remains subservient to the neighbouring property

4.9 As per earlier consented schemes modestly scaled roof lights are proposed to the front elevation and rear elevation of the building. While slightly different in scale and positioning in comparison to the consented scheme, the effect of these rooflights would be comparable. As identified as part of the 2019 application, roof lights are a common occurrence within the area and the inclusion of a small number of these within the roof structure of the application site will not affect the significance of the conservation area.

4.10 Overall, changes to the roof of 25 St George’s Road are modest in form and scale and are well suited to the context of the host building and this part of the conservation area. The changes to the roof would not affect the overall aesthetic value of building or its contribution to the St Margaret’s Estate Conservation Area and the character, appearance and significance of the conservation area as a whole would be preserved.

Changes to the Rear Ground Floor Extension

4.11 Changes to the consented ground floor extension entail the modest extension of this consented addition so that it matches the height and alignment of the new rear extension at 23 St George's Road. The aesthetic of the ground floor extension, as consented in 2019, would not alter. There is no visibility of this addition from St George's Road and only limited visibility from the pleasure ground's access lane to the rear of the site due to the height of the existing boundary wall. While there would be a wholly minor change in views along this lane this as a result of the increased scale of the addition, this is not considered harmful to the significance, character or appearance of the conservation area insofar as the aesthetics of the addition would represent an enhancement in comparison to the existing arrangement and the scale of the addition would wholly align with the scale of a recently consented addition to no. 23.

Changes to the Garage

4.12 In comparison to the consented scheme the proposals for the garage entail the considerably reduction of the footprint of this structure (so that the new front wall sits behind principle façade) and architectural enhancements through the provision of a simply detailed and well designed frontage to the garage. These works represent a clear enhancement in comparison to the earlier consented scheme and existing arrangement and would result in a minor local enhancement to appearance of the conservation area.

Various Elevational Changes

4.13 Other changes to the elevations of 25 St George's Road include dropping of the windows cills to two ground floor windows (Family and Sitting Rooms on the front and side elevations) to provide French doors and the addition of a single first floor casement window to the rear elevation. The replacement windows would reflect the style of those already on the building/consented so to ensure that they are architecturally in keeping with the host building and the provision of French windows in these two locations would have limited presence in the wider streetscape given the boundary treatments proposed (see below). Overall, these elevational changes represent a minor change from the consented scheme and

which would not have any bearing on the building's contribution to the conservation area thus preserving the significance of this asset.

Changes to Landscaping and Boundary Treatments

4.14 Proposals also entail various alterations and landscaping at the site. These can be summarised as:

- Introducing a new 2m high brick wall in replacement of the existing boundary treatments to St George's Road;
- Removing the existing northern car access gates to create a private garden; and
- Widening of the existing southern car access made to accommodate two off street cars.

4.15 As noted in the preceding section, the character of the conservation area is varied with an eclectic mix of architectural styles and boundary treatments are reflective of this variance. The increasing of the height of the boundary wall as proposed, while resulting in a visual change to the site itself, would not affect the character of the area as whole were other taller brick boundary walls exist in close proximity. The proposed walls would not be overly prominent in the streetscape and would not affect any sense of mature planting within the garden which would be over the height of the proposed wall.

4.16 The blocking of the existing northern vehicular access and the widening of the existing southern vehicular access would have no effect on the character, appearance or significance of the conservation area as a whole with the character of the boundary wall as an enclosing structure preserved.

Policy Compliance

4.17 As required by paragraph 194 of NPPF (2021) this report has described the significance of the identified heritage asset (in this case the St Margaret's Estate Conservation Area), including the contribution made to significance by the site; 25 St George's Road.

4.18 Overall, the proposed alterations to 25 St George's Road are relatively minor and proportionate to the scale of the host post-war building. These additions would sit comfortably with the existing building and wider area and would not affect the slight positive contribution the building makes to the conservation area or to be harmful to the significance or special interest of the conservation area as a whole. This is especially the case given the varying character of the residential dwellings in the area and on St George's Road and the way in which the alterations proposed reflect the existing character of the building which is already a much later addition to the area.

4.19 The proposed development also enables beneficial works of the 2019 consented scheme to be carried out alongside a minor aesthetic enhancement secured by changes to the garage as part of this application. Beneficial works of the 2019 scheme also proposed as part of this application include:

- The removal of the cantilevered bathroom which projects out the massing of the building's first floor when viewed from the side elevation, St George's Road and access lane to the pleasure gardens; and
- The removal of the contrasting flat roof which is visible on the side elevation and its replacement with an in keeping and matching pitched roof.

4.20 Overall, while the proposed development will amount to a slight change within this part of the conservation area, this change will wholly preserve the significance and special interest of the conservation area by virtue of the reasons identified above. Indeed, a number of the works are identified as being beneficial to the character, appearance and significance of the conservation area and capable of resulting in a localised enhancement to this part of the designated heritage asset.

4.21 Therefore, for the purposes of the NPPF the proposed development will fall outside of the remit of paragraphs 201 to 202 insofar as no harm to the significance of designated heritage asset will be incurred. Rather, the proposals amount to a slight enhancement due to the benefits outlined above and, in accordance with paragraph 206 of the NPPF, as an application which better reveals the significance of these assets, the application should be treated favourably by the Local Planning Authority.

4.22 The proposed development is also considered to comply with relevant local planning policies as follows:

- *Policy LP 1 Local Character and Design Quality*: The proposed development accords with the requirements of this policy insofar as it is of high architectural and urban design that respects, contributes to and enhances the local environment and character. Specifically, the proposed development is compatible with the area's local character and preserves, if not enhances, the significance of the conservation area.
- *Policy LP 3 Designated Heritage Assets*: In accordance with the requirements of this policy, the proposed development makes a positive contribution to the borough's historic environment, gives great weight to the conservation of the St Margaret's Estate Conservation Area and preserves, if not enhances, its significance
- *Relevant policies of The London Plan (2021)*: In accordance with the requirements of policy HC1, the proposed development is sympathetic to and conserves the significance of the identified heritage asset, the St Margaret's Estate Conservation Area.
- *St Margaret's Estate Conservation Area Statement*: The proposed development is considered to accord with numerous opportunities identified within this document include opportunities for preservation, enhancement and reinstatement of architectural quality and unity.

4.23 In summary, the proposed development is in accordance with relevant national planning policy guidance, namely National Planning Practice Guidance and the St Margaret's Estate Conservation Area Statement. There would be preservation for the purposes of the decision maker's duty under Section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990.

4.24 Should LBR reach a different conclusion and consider there to be any harm to the significance of any of the conservation area, this must surely be only a wholly limited level of less than substantial harm that would not seriously affect the significance of that asset (**Appendix 1**). Should this be the case, in accordance with paragraph 202 of the NPPF, this wholly limited effect should be balanced against the significant public benefits secured by the scheme which, in accordance

with paragraph 020 of the PPG, include heritage based public benefits such as those identified above at paragraph 4.19.

5. Conclusions

- 5.1** This Heritage Statement presents an assessment of the significance of the designated heritage assets capable of being affected by the proposed extension and alteration of the application site, 25 St George's Road, namely the St Margaret's Estate Conservation Area. This is followed by an appraisal of the effects of the proposed development upon these heritage assets with consideration given to legislation and local and national planning policy and guidance.
- 5.2** The St Margaret's Estate Conservation Area was first designated in November 1971 and is a residential area characterised by a large proportion of typically late 19th grand villas, spacious plots, an eclectic mix of architecture and series of private pleasure grounds and mature gardens. Much of the area's character derives from the way in which it was developed as a single estate in the park of St Margaret's House (now demolished).
- 5.3** 25 St George's Road was constructed during the mid 20th century and is one of the few examples of later 20th century infill development within the conservation area. The building is of no specific architectural or historic interest given its later date and simplistic form and appearance and has not been identified as a Building of Townscape Merit by LBR. Any contribution to the conservation area is wholly limited by virtue of the building's late date, standardised form and character and poor quality rear and side additions which contrast with the area's established character and are highly visible from St George's Road and the access lane to the pleasure grounds.
- 5.4** Following the recent refusal of an application on the site (LPA ref: 21/2205/HOT) due to the increase of the building's ridgeline by 1m and introduction of a blind dormer to the rear elevation, proposals have been amended to take into account officer concern. Specific changes include:
- The ridgeline is proposed to be raised by 0.75m (1m was previously proposed); and
 - The rear windowless dormer has been removed.

- 5.5** All other aspects of the proposed development, which did not raise concerns from LBR officers, remain consistent with the refused scheme.
- 5.6** As identified in Section 4 of this report, the proposed works to 25 St George's Road are based on a thorough understanding of the significance, character and appearance of the conservation area. The amendments made to the scheme since the recent refusal have demonstrably reduced the massing of the roof structure. Overall, as concluded in Section 4, the proposed development would not result in harm to the significance of the conservation area but would rather preserve the significance of the St Margaret's Estate Conservation Area and result in a localised enhancement within this part of the designated heritage asset.
- 5.7** In summary, the proposed works to 25 St George's Road are considered to be proportionate and, in accordance with the requirements of the NPPF and relevant local planning policies and guidance. There would be preservation for the purposes of the decision maker's duty under Section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁸

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁸ See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.

Standard Sources

<https://maps.nls.uk>

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

www.heritagegateway.org.uk

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

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

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

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

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