

**18 Church Avenue
Ruislip
Middlesex
HA4 7HT
NGR: TQ 089 874**

**A
Heritage Impact Assessment
on a
Proposed Extension**

Text
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May 2022
Mercian Heritage Series 1923

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Summary

Proposals are being developed to replace an existing single storey rear extension to No.18 Church Avenue, a house probably built in the 1920's, with one of two storeys with attics, and to create rooms within the capacious roof space of the original building. The building is neither listed nor local listed but does sit within the Ruislip Conservation Area.

This report was commissioned, under the guidelines of the National Planning Policy Framework (NPPF) and local planning policies, to better understand the potential heritage impact of the proposals on the conservation area and of any other heritage assets in the vicinity. It concludes that the proposals would cause no harm to the character of the conservation area or to any other heritage assets; consequently, neither Sections 66 or 72 of the 1990 Planning Act nor Paragraphs 201-3 of the NPPF would be engaged.

1. Introduction

Proposals have been made to replace an existing single storey extension to the rear of 18 Church Avenue, Ruislip, an unlisted property probably built in the 1920's, with a taller extension of two storeys with attics; additionally, it is proposed to convert the existing roof space of the main part of the property to domestic use.

The site is within the Ruislip Conservation Area. This report was commissioned, under the guidelines of the National Planning Policy Framework, to provide a suitably detailed heritage impact assessment of the proposals on the character, setting or significance on adjacent designated or non-designated heritage assets – including the conservation area.

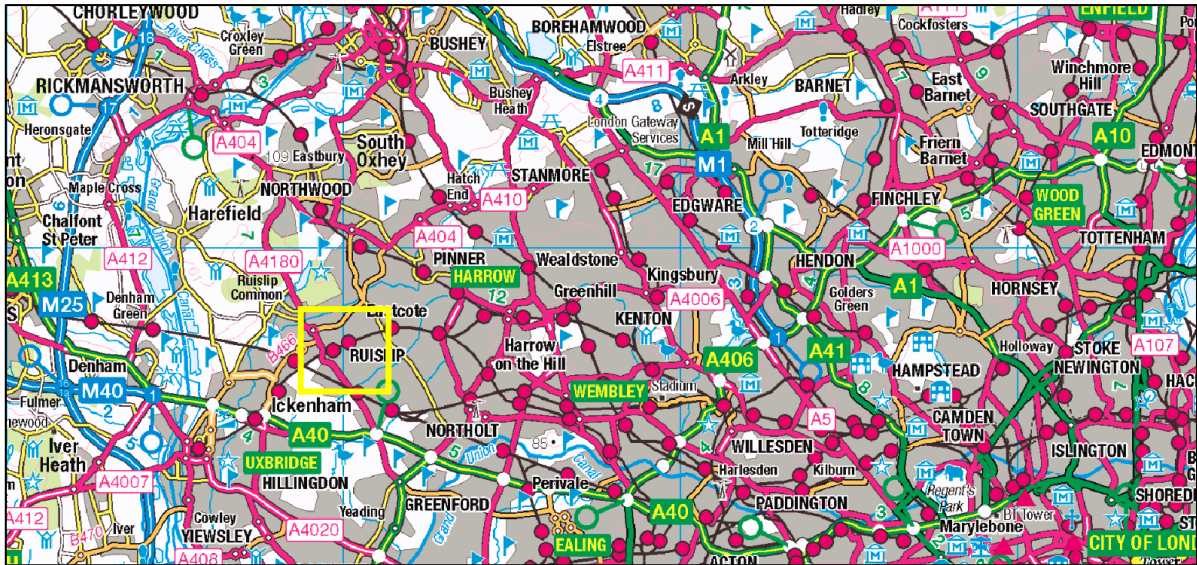


Fig.1: Location and Block Plan (OS OpenData and ProMap).

2. Planning Legislation & Guidance

2.1 The National Planning Policy Framework

Planning law relating to listed buildings and conservation areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the Act deals with the responsibilities of local planning authorities – the decision makers - when dealing with planning applications that could impact on heritage assets and states that:

*‘In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State 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’.*¹

Section 72 of the same Act states that, in relation to conservation areas:

*‘with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.*²

Government guidelines regarding the listed buildings and conservation areas legislation in the 1990 Planning Act changed twice in two years, resulting in the introduction of a new *précis* of planning guidance published in March 2012 – the *National Planning Policy Framework* (NPPF) – which replaced all other separate *Planning Policy Guidelines* and *Planning Policy Statements*.³ A revised version was published in July 2018, another in February 2019 and yet another in July 2021.⁴ The glossary of the NPPF described ‘heritage assets’:

‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).’

The main relevant paragraph in the NPPF states that local planning authorities should require applicants:

*‘...to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposals on their significance’.*⁵

¹ Planning (Listed Buildings and Conservation Areas) Act 1990 c.9 section 66 (1), 41

² *Ibid.* section 72

³ Department for Communities & Local Government, 2012, *National Planning Policy Framework*.

⁴ Ministry of Housing, Communities & Local Government, 2021, *National Planning Policy Framework*.

⁵ *Op. cit.*, para. 194

3. Heritage Impact Assessments

3.1 General Introduction

The purpose of a heritage impact assessment (HIA) is to meet the relevant guidance given in the NPPF. This outlines the need to inform the planning decisions when considering proposals that have the potential to have some impact on the character or setting of a heritage asset. It is not concerned with other planning issues.

The nature of the heritage assets and the potential impact upon them through development are both very varied. The heritage assets include both designated heritage assets – such as listed buildings, scheduled ancient monuments and conservation area – and non-designated heritage assets, a rather uncomfortable and sometimes subjective category that includes locally listed buildings, field systems, buried archaeological remains and views.

The degree of impact a development could have on such assets is variable and can sometimes be positive rather than negative. The wide range of possible impacts can include loss of historic fabric, loss of historic character, damage to historic setting, and damage to significant views.

Under the requirements of the NPPF and of other useful relevant guidance, such as English Heritage's *Conservation Principles* and *Informed Conservation*, and recent material from the newly formed Historic England, the process of heritage impact assessments can be summarised as involving three parts:

1. understanding the heritage values and significance of the designated and non-designated heritage assets involved and their settings;
2. understanding the nature and extent of the proposed developments;
3. making an objective judgement on the impact that the proposals outlined in Part 2 may have on the information outlined in Part 1.⁶

3.2 Definition of Setting

Setting, as a concept, was clearly defined in PPS5 and was then restated in the NPPF which describe it as:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

⁶ English Heritage, 2008, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*; Clark, K, 2001, *Informed Conservation*

The latest version of the Historic England guidance on what constitutes setting is virtually identical to the former English Heritage guidance:

‘Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.’⁷

The new Historic England guidance also re-states the earlier guidance that setting is not confined entirely to visible elements and views but includes other aspects including environmental considerations and historical relationships between assets:

‘The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance’.⁸

In terms of the setting of heritage assets the approach is the same but the latest Historic England guidance - *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3* (GPA3) of 2017 - suggests a five-step approach.⁹

The steps are:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

⁷ Historic England, 2017, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3* (2nd ed.), para.9

⁸ *Op.cit.*, Part 1, reiterating guidance in the PPG of the NPPF.

⁹ *Op.cit.*, para.19

3.3 Definition of Significance

The glossary of the *Planning Practice Guidance* (PPG) to the NPPF defines significance as:

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

These are further explained as:

- **Archaeological interest:** *as defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.”*
- **Architectural and artistic interest:** *These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*
- **Historic interest:** *An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

The PPG also states that:

‘Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as ‘locally listed’’.¹⁰

but cautions that:

‘A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process’.¹¹

¹⁰ Planning Practice Guidance, 2014, paragraph 39

¹¹ *Ibid.*

3.4 Definition of Harm

Current guidance by Historic England is that ‘change’ does not equate to ‘harm’. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – *substantial* and *less than substantial*. Paragraph 201 of the revised NPPF states that:

‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable use of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use’.*¹²

Paragraph 202 of the revised NPPF states that:

‘Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals including, where appropriate, securing its optimum viable use’.

Recent High Court rulings have emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to ‘*have special regard to the desirability of preserving the [listed] building or its setting*’. As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding impact on the setting of a listed building:

‘It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.’

The judgment was agreed by Lord Justice Lewison at the Court of Appeal, who stated that:

*‘It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused’.*¹³

¹² Ministry of Housing, Communities & Local Government, *op. cit.*, para.201

¹³ Court of Appeal (PALMER and HEREFORDSHIRE COUNCIL & ANR)(Case No: C1/2015/3383) 34.

4. Setting & Outline History

No.18 Church Avenue is one of a pair of large dwellings a little to the south-west of the historic parish church of Ruislip. Until the start of the 20th century Ruislip was a small village in the valley of the River Pinn in a still rural part of north-western Middlesex; it was then probably little larger than it had been at the time of the Domesday Survey of 1086 when it was listed as *Rislepe* – the derivation of the name still being open to debate.

At the start of the 20th century the line of what would become Church Avenue was a footpath running south-westwards from the core of Ruislip to the hamlet of Kingsend (*see* Fig.2). The land it passed through was part of the Park House estate.

The opening of the Harrow & Uxbridge Railway to a station at Ruislip in 1904 – and the electrification of the line and its absorption into the Metropolitan Railway in the following year – led to the transformation of the village; initially it became a place for day trips for Londoners but the real changes related to its development as a commuter village for the capital. In the late-19th century the population of the parish was under 2,000. By 1921 the population of Ruislip had reached over 9,000 and by 1951 was nearly 70,000.

Much of the early development was on land that had for centuries belonged to King's College, Cambridge, and it seems that the College had a direct involvement on how the housing would be laid out and designed – influenced by the still relatively new 'garden suburb' movement with shades of the Arts & Crafts style.

In 1906 the Park House estate – which did not belong to the College – was bought by developers Dickens and Welch who began dividing up the land into building plots based on new roads replacing the old footpaths – in the case of Church Avenue and Manor Road, and creating an entirely new King Edward's Road.¹⁴

The first plots were put up for auction the same year but few houses had been built by the start of the First World War. The development then stalled and few houses are shown on Church Avenue on the 1916 revision of the Ordnance Survey mapping; work restarted after the conflict with many houses built in the 1920's and early-1930's – including No.18 Church Avenue.

Despite not directly impacted by the same regulations as the areas owned by King's College, the general stylistic influences of those areas clearly percolated down into the design of the houses along Church Avenue as well – though the architectural character and material palette was very varied.

¹⁴ See e.g. Bowit, E, 2013, *Ruislip Through Time*

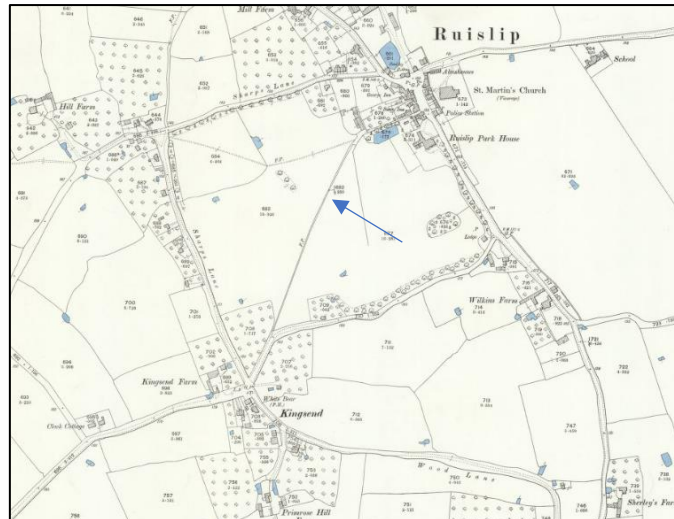


Fig.2: Extract from the 1894 revision of the 1:2500 Ordnance Survey map.



Fig.3: Extract from the 1912 revision of the 1:2500 Ordnance Survey map.

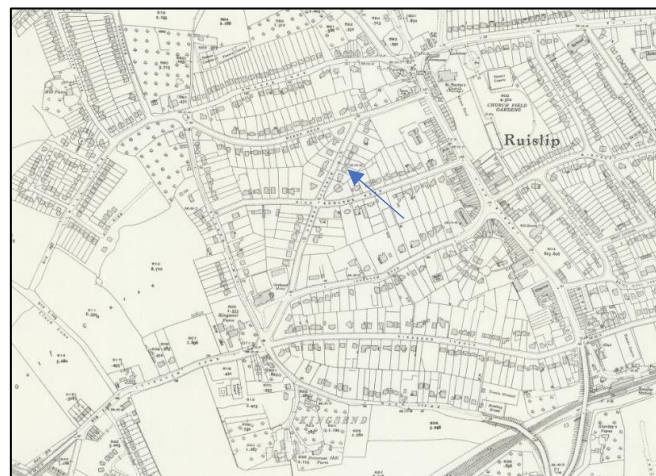


Fig.4: Extract from the 1935 revision of the 1:2500 Ordnance Survey map.

5. Description

No.18 lies on the east side of Church Avenue and is built parallel to it. Compared to most of the other contemporary 1920's properties in the street, it is fairly plain in its design and detailing. It is considered to be of limited intrinsic architectural or historical merit and lacks any of the *faux* timber-framing and Tudorbethan characteristics of many of those in the street.

In contrast to the prevailing style of contemporary houses in the area, it consists of a plain rendered two storey rectangular main range built parallel to the street under a very tall and hipped roof covered in plain tiles. The front elevation is of four bays but not symmetrical, and it has a possibly later porch in the second bay from the left with a first-floor window above it.

To the left are broad three-light casement windows on each floor. To the right the two bays have plain cross-mullioned windows under flat heads topped by semi-circular relieving arches of exposed brick and two-light casements on the floor above.

There are shallow projecting brick stacks in both gables, wider on the south gable which also has thin windows at both floor levels to either side. Also abutting the southern gable end is a brick-built single-storey lean-to garage.

Attached to the right-hand two-thirds of the plainer and even more asymmetric rear elevation – which is of three bays – is a single-storey lean-to. To the left of it is a pair of French windows on the ground floor with a three-light casement above. Above the lean-to are two two-light windows. The house has been well-maintained and been improved, upgraded and re-windowed.



Pl.1: No.18 Church Avenue from the south-west.

6. The Proposals

Proposals have been made to replace the existing rear single-storey rear extension with a taller two storey range with attics, to be built at right-angles to the main front range and ending in a plain gable. In the angle between the side of the extension and the southern end of the rear wall of the front range is a flat-roofed single storey infill.

It is also intended to utilize the capacious roof of the front range for additional accommodation, lit by a single dormer on the rear roof slope and three small rooflights on the front elevation to the street. The exterior work will be undertaken in the same general material palette as the existing property.

7. Heritage Impact Assessment

7.1 Impact on the Building

No.18 Church Avenue is not a listed building or a non-designated heritage asset as defined by the guidelines of the National Planning Policy Framework; it is also not a locally listed building. Therefore neither Section 66 of the 1990 Planning Act nor Paragraphs 201-3 of the NPPF do not apply in terms of the impact on the building.

7.2 Impact on the Conservation Area

Church Avenue is within the extensive Ruislip Conservation Area. Conservation areas, first created in 1967, are designated heritage assets under the auspices of the National Planning Policy Framework and have been protected – with a varying degree of success - from the adverse impact of unsuitable development through the passing of various planning Acts, the last being the consolidation Planning Act of 1990.

When this was first established in 1969 it was confined to the historic core of the village and was fairly limited in extent. It has since been significantly extended to include much of the 20th century residential developments, including the Avenue. The latest *Conservation Area Appraisal* appears to date to 2010; whilst Historic England advice is that they should be reviewed every five years, few LPAs have the resources to do so and the *Appraisal* does appear to be comprehensive and well-written. The *Appraisal* breaks the conservation area into specific character areas Church Avenue is in Character Area 3. Church Avenue is briefly described in Section 7.15 of the *Appraisal*:

‘This road contains some of the best quality and larger 1920-30s houses within the area. Many of the properties are well detailed and retain a wealth of original features. The Gables, a “Tudorbethan” landmark building at the corner of Manor Road, is a particularly fine example. It is constructed of warm red bricks, with decorative dark stained timber framing to the high level gables, interspersed with white rendered panels. The wooden framed windows house traditional leaded lights and the front door is set within a Tudor style stone arch’.



Pl.2: No.18 from the north-west in context.



Pl.3: General view northwards along Church Avenue, No.18 arrowed.



Pl.4: General view south along Church Avenue, No.18 arrowed.

The general overarching principle of both national and local planning policies is to prevent any development that does not either preserve or enhance the special character of the conservation area. This is taken up in the guidance of the revised *National Planning Policy Framework*, which states that:

*‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably’.*¹⁵

At the same time, the NPPF recognises that *‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance’*.¹⁶ It is suggested that this is the case in regard to rear elevations of No.18 and other buildings in the street. These elements are also, because of the relatively close spacing of properties on the street frontages, difficult to see from the public domain.

The proposed design of the enlarged rear range to No.18 is considered to be well-designed and in keeping with the general scale and massing of the conservation area, as well as being of a similar material palette – i.e. painted render and plain tile – to many of the buildings within it.

The rich diversity and variety of roof shapes within the conservation area includes gabled and hipped ended roofs as well as varieties of half-hips – some with *faux* timber-framing and others plain rendered.

The only change to the public domain of the streetscape will be the introduction of small roof lights in the front roof slope of the main part of the building; it is considered that the use of ‘conservation’ roof lights would mitigate the very minor visual impact that the proposed roof lights would have.

Overall it is considered that the proposals would not adversely impact the character or significance of the conservation area and therefore it is concluded that neither Section 72 nor Paragraphs 201-2 of the NPPF would be engaged.

7.3 Impact on Adjacent Heritage Assets

There are no listed buildings in the vicinity of the proposed rear extension and it could not be seen from the one nearby locally listed building to the north-west – the aptly named Gables on the corner of Church Avenue and Manor Road. Consequently it is considered that the proposals would have no impact on any adjacent heritage assets – designated or non-designated – and therefore neither Section 66 of the 1990 Planning Act nor Paragraphs 201-3 of the NPPF would be engaged.

¹⁵ Ministry of Housing, Communities & Local Government, *op. cit.*, para.200

¹⁶ *Op. cit.*, para.201

8. Conclusions

For the reasons outlined above it is considered that the proposals will result in no harm to the character, setting or significance of the conservation area or to any other adjacent designated or non-designated heritage assets. Therefore, neither Sections 66 or 72 of the 1990 Planning Act nor Paragraphs 201-3 of the National Planning Policy Framework would be engaged.

As outlined in the pioneering 2008 document, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* that:

‘Change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people’s responses to social, economic and technological change’

That change does not equate to harm in law was also made clear in one of the key High Court judgements related to conservation areas by Lord Bridge, related to developments within conservation areas, *South Lakeland District Council vs. Secretary of State for the Environment*. He stated that whilst all developments within a conservation area *‘must give a high priority to the objective of preserving or enhancing the character or appearance of the area’*, where a development would not have any adverse impact and met other planning requirements:

‘.... One may ask rhetorically what possible planning reason there can be for refusing to allow it. All building development must involve change and if the objective of Section 277(8) [of the 1971 Planning Act, substantially the same as Section 72(1) of the 1990 Act] were to inhibit any building development in a conservation area which was not either a development by way of reinstatement or restoration on the one hand (‘positive preservation’) or a development which positively enhanced the character or appearance of the area on the other hand, it would surely have been expressed in very different language...’¹⁷

¹⁷ 1992, *South Lakeland District Council vs. Secretary of State for the Environment*

9. References

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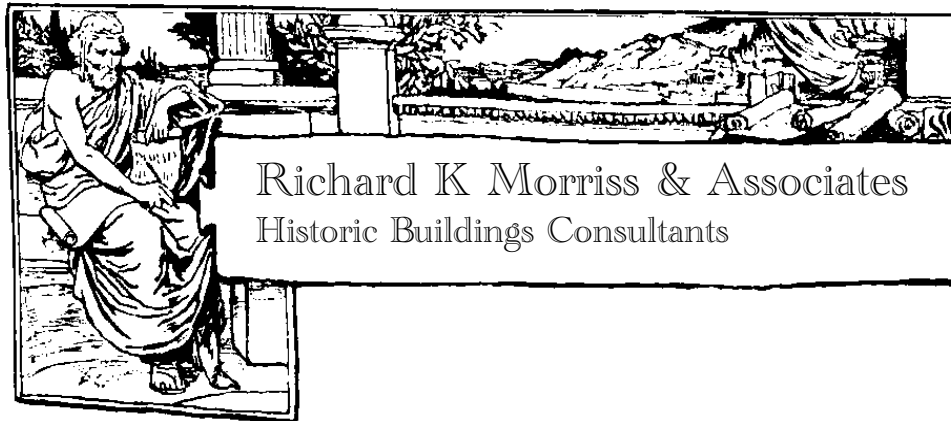
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Planning (Listed Buildings and Conservation Areas) Act 1990



The Consultancy

Richard K Morriss founded this Consultancy in 1995 after previously working for English Heritage and the Ironbridge Institute of the University of Birmingham and spending eight years as Assistant Director of the Hereford Archaeology Unit. Although Shropshire-based the Consultancy works throughout the UK on a wide variety of historic buildings for clients that include the National Trust, the Landmark Trust, English Heritage, the Crown Estates, owners, architects, local authorities, planning consultants and developers. It specialises in the archaeological and architectural analysis of historic buildings of all periods and planning advice related to them. It also undertakes heritage impact assessments and broader area appraisals and Conservation Management Plans.

*Richard Morriss is a former Member of the Institute of Field Archaeologists and of the Association of Diocesan and Cathedral Archaeologists, currently archaeological advisor to four cathedrals and author of many academic papers and of 20 books, mainly on architecture and archaeology, including *The Archaeology of Buildings* (Tempus 2000), *The Archaeology of Railways* (Tempus 1999); *Roads: Archaeology & Architecture* (Tempus 2006) and ten in the *Buildings of* series: Bath, Chester, Ludlow, Salisbury, Shrewsbury, Stratford-upon-Avon, Warwick, Winchester, Windsor, Worcester (Sutton 1993-1994). The latest work is an Historic England funded monograph on the Houses of Hereford (Oxbow 2018).*

He was a member of the project teams responsible for the restoration of Astley Castle, Warwickshire, winner of the 2013 RIBA Stirling Prize; the restoration of the Old Market House, Shrewsbury, winner of a 2004 RIBA Conservation Award; and Llwyn Celyn, Monmouthshire, winner of the RICS Conservation Project of the Year 2019. He has also been involved in several projects that have won, or been short-listed for, other awards including those of the Georgian Group for Mostyn House, Denbigh; St. Helen's House, Derby; Radbourne Hall, Derbyshire and Cusgarne Manor, Cornwall.



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