



Da Vinci House
44 Saffron Hill
London EC1N 0JR
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

FAO Christopher Brady
Planning Officer
London Borough of Hillingdon

Issued by email

THE BARN HOTEL, RUISLIP – LETTERED RESPONSE TO HISTORIC ENGLAND FEEDBACK APPLICATION REF. 7969/APP/2023/1473

This letter is supplied on behalf of Chase New Homes (the 'Applicant') to provide a response to consultation feedback issued by Historic England with relation to the proposed development at The Barn Hotel, Ruislip (application ref. 7969/APP/2023/1473).

There are some key headlines that can be taken from the Historic England letter, based on our extensive experience of receiving these letters, across a broad range of sites:

- Firstly, this is not only not an objection letter, its not even the standard, "we think there's harm, and you need to weigh that against the public benefits" letter. It's a 'there might be harm, we'd ideally like more information'. There's a strong suggestion in the letter that the internal harm/heritage balance might actually be struck (a residual finding of 'no harm') in the application. That's the implication in:

In judging whether the balance of heritage harm and benefit presented by the proposals resolves in favour of the application, and whether harm is outweighed by the public benefits it would secure, you should also be confident that harm has been minimised and any that would be caused in clearly and convincingly justified.

- The level of harm identified as arising from the new build elements is clearly not significant, harm is only identified as 'likely', which is very different to a finding of 'clear harm' as we might see on other letters. HE are uncertain whether harm will actually arise.
- Heritage benefits are clearly identified. It appears possible that an overall finding of no harm (balancing harms and benefits) is possible in the view of Historic England.

Historic England are equivocal about their finding of harm within the application. The letter recommends that additional design detail is required for them to confidently make a judgement as to the overall impact of the proposal. Such detail can be conditioned by the Council, as providing this information for approval was always the intention of the Applicant.

Historic England identify benefits arising from the proposed conversion of the listed buildings, particularly from the removal of modern additions, reveal of historic elevations and better expression of their relationship to each other. They do not identify harm associated with the conversion works, rather they acknowledge the *potential* for harmful effects, but make clear that such harm may well not arise, and that further detail will prove this point. In particular, they seek assurance as to the structural safeguarding of the buildings during conversion works, and clarity on the extent of alteration to historic internal fabric. Again, our view is that this can be conditioned, and that the Council has the necessary controls through the Condition process to minimise harm and ensure that the scheme maximises opportunities for enhancement.

Historic England consider that the 'scale and density within the broader former farmyard surroundings of the [listed buildings] would create a harmfully unsympathetic setting'. Historic England note that the proposed development misses the 'opportunity [...] to enhance the listed group by provision of a setting which better supports their appreciation as a significant historic farm complex'. Our view has always been that seen in isolation, a degree of harm to the setting of the listed buildings would arise

from the construction of the new build development, but that this has to be weighed against the benefits of the rest of the scheme. This is also the approach of Historic England. It is our strong view however, contrary to Historic England's, that the proposal does take the opportunity to improve the immediate setting of the listed buildings, with the change to their wider setting *resulting from new development which is necessary to support enhancements to the building's fabric and immediate setting*. Such enhancements – both explicitly identified by Historic England – must be a weighty consideration in the heritage balance, especially given that the wider setting to the listed buildings has experienced much change over time and presently makes limited contribution to their significance.

Overall, Historic England are do not object to the scheme, or take the opportunity to expressly identify clear harm, and imply potential support for the scheme, subject to provision of design detail. Benefits associated with improvements to the immediate setting of the listed buildings, and enhancements to their fabric, are identified by them. They require additional detail to assure them there are no hidden harms associated with the conversion of the buildings, and this can be supplied by the Applicant. Historic England acknowledge (as do we) some harm to the wider setting of the listed buildings resulting from the scale of new development.

We once again urge officers to weigh a low level of less than substantial harm against the planning benefits of the scheme, in line with NPPF paragraph 202. This harm should be given considerable importance and weight in the planning balance but should also be carefully considered in terms of its overall magnitude¹. In our view, the residual harm arising should not be sufficient to outweigh the very considerable planning benefits of this scheme.

Should the Council consider that any further details are required to determine this application, please do not hesitate to contact Georgie Mark at mob. 07799 369 987 or gmark@iceniprojects.com or Laurie Handcock at mob. 07795031741 or lhandcock@iceniprojects.com.

Yours sincerely,

A handwritten signature in black ink that reads "Iceni Projects Ltd." in a cursive, flowing style.

Iceni Projects Ltd.

¹ It may be of assistance in this regard to refer to the Court of Appeal judgement in *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061 (04 November 2016). This stated that, "*The duty to accord 'considerable weight' to the desirability of avoiding harm does not mean that any harm, however slight, must outweigh any benefit, however great, or that all harms must be treated as having equal weight. The desirability of avoiding a great harm must be greater than that of avoiding a small one.*" (Para. 34)