Proposed two storey extension

Proposed single storey side extension

Existing hedge to be cut back and new planting area formed

Dotted line denoting 45° line from no.4 Park Crescent first floor window

Dotted line denoting 45° line from no.6 Park Crescent first floor

Hatch denoting existing structures to be removed

NOTE: ALL DIMENSIONS MUST BE CHECKED ON SITE AND NOT SCALED FROM THIS DRAWING.

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1:200 @ A2

SITE PLAN 24/09/18 JC
Appendix 2
Appendix 2
REVISED STATEMENT OF SIGNIFICANCE & HERITAGE IMPACT ASSESSMENT

In respect of

PROPOSED ALTERATIONS & EXTENSIONS TO 5 PARK CRESCENT, ABINGDON

On behalf of

Glen Chapman

AHC REF: ND/9742

May 2019
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Every effort is made to provide detailed and accurate information. However, AHC Ltd. cannot be held responsible for errors or inaccuracies within this report.
1.0 INTRODUCTION AND SCOPE OF REPORT

1.1 The purpose of this revised report, which has been prepared and written by Dr. Nicholas Doggett, FSA, MICfA, IHBC, Managing Director of Asset Heritage Consulting Ltd., on behalf of Glen Chapman, the owner of 5 Park Crescent, an unlisted building situated in the Albert Park Conservation Area in Abingdon, is two-fold.

1.2 The first is to provide an assessment of the heritage significance of the house and the contribution it makes to the character and appearance of the conservation area, and the second is to provide the application proposals for the building's alteration and extension with a cogent and sustainable justification in heritage terms.

1.3 The value of this two-stage approach (of assessing significance first and allowing this to inform an applicant's proposals) is that it complies with the requirements of paragraph 189 of the National Planning Policy Framework (NPPF).

1.4 This rightly places the onus on those planning changes to historic assets to begin this process with a clear description of the significance of the assets affected, albeit that the requirement in the NPPF is only such that ‘The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’.

1.5 Indeed, the need to understand and evaluate ‘significance’ before moving on to assess the impact of potential change on that ‘significance’ has for some time been regarded as good conservation practice in the design and application process (see, for instance, English Heritage’s ‘Conservation Principles’, 2008) and, following the introduction of the short-lived PPS5 in 2010 and then the first version of the NPPF in 2012, is now effectively a standard requirement for most applications affecting designated heritage assets.
1.6 Importantly, this approach also demonstrates to the Council (or to any other decision maker) that the heritage significance of a building or site as it currently exists has been fully analysed and understood as an integral part of the application proposals.

1.7 It is important to note that the provision of this revised report is not to be seen as an acknowledgement that the previous version was in any way flawed in its approach or its conclusions, but is instead provided because the Council’s officers wish to ensure that their previous recommendation to planning committee to grant planning permission for the scheme as it currently stands is supported by a heritage report that is as robust as possible.

1.8 In this respect, this version of the report addresses three issues not fully covered in the January version, or its Addendum prepared in April. These are as follows: more information is provided on the heritage significance of Albert Park and the relationship of the Park Crescent houses to this; a comparative assessment of the significance and impact on that significance of Nos.5 & 6 Park Crescent in tabular form; and, finally, an assessment of the importance of the original spaces between the late Victorian/Edwardian houses on Park Crescent, as referred to in the Heritage Rebuttal report provided by Heritage Places in January 2019.

1.9 It remains my professional opinion that, for all the detailed reasons set out in this report, there is no material reason in heritage terms why planning permission should not be granted for the application proposals as they currently stand.
2.0 DESCRIPTION AND ASSESSMENT OF HERITAGE SIGNIFICANCE

2.1 No.5 Park Crescent, which forms part of a symmetrical pair with its neighbour (to the left), No.4 Park Crescent, is situated towards the southern end of Park Crescent, the long D-shaped road, running around Albert Park, which was itself laid out by I.W. Chapman of Dulwich.

2.1 As referred to in various sources (among them Celebrating 150 Years of Albert Park, edited by Sandy King and published by the Albert Park Residents’ Association in 2015), work on the Albert Park Estate began in 1859, the whole development being carried out in much the same manner as the contemporary Norham Manor estate in North Oxford, a parallel also drawn in the recently revised ‘Pevsner’ for Berkshire.

2.2 The houses along Park Crescent are largely in the Victorian Gothic tradition, many the work of Edwin Dolby (1838-1900), and were mostly built in the late 1860s and early 1870s, with some also by his pupil and successor, J.G.T West (1860-1931).

2.3 What the authors of the recently revised ‘Pevsner’ (2010) describe as the ‘best mansions’ on the estate are located on the northern side of Park Crescent (originally called Albert Crescent) and were all present by 1875 (see the map on p.54 of Celebrating 150 Years of Albert Park at Appendix 1).

2.4 As such, Nos.4 & 5, which are situated on the western section of Park Crescent, are among the later houses to be built around the park and were probably the work of Dolby’s pupil, J.G.T. West, being erected only in 1902-3 (see pp.10-11 of the Heritage Places report).

2.5 Certainly, although they are well-built and attractively designed, Nos.4 & 5 (along with their near identical twins at Nos. 6 & 7) are not architecturally remarkable in comparison to some of the more interesting or idiosyncratically designed houses on the Estate, which are individually mentioned in the recent ‘Pevsner’ revision.
2.6 These houses include the nearby No.3 Park Crescent by Dolby (1882), described (p.119) as ‘moving towards a plainer Philip-Webb style’, and Nos.1 & 2 (1868) of a ‘High Victorian style’ (plates 1-2), while as noted above Nos.4 & 5 are also a far cry from ‘the best mansions’ on the Estate, situated on the northern side of the road close to Abingdon School.

2.7 Nos.4 & 5 Park Crescent are three-storey buildings constructed of red brick (laid in English bond to the ground floor with stretcher bond to the upper floors) with fictive timber framing to the gables, which also wraps around the front part of the return elevations, and form an essentially symmetrical composition to the street scene.

2.8 There are however some disruptions to this apparent symmetry with Nos.6 & 7. In contrast to Nos.4 & 5, on which the fictive timber framing extends all the way from first-floor level to the apex of the street-facing gables, the framing on Nos.6 & 7 is only at attic level to the gables (extending instead to the central section on the first floor) and there is also tile hanging above their attic windows.

2.9 There are also some differences to the fenestration pattern of the street elevations, notably in the provision of the prominent bay windows on the ground floor of Nos. 6 & 7. These houses also have modern porch additions to their return elevations, while although it is not attached to the building, the ugly mid-20th century garage, which until its recent demolition was set back behind No.5, was clearly visible from the street and disrupted the house’s symmetrical composition when viewed from there (plates 3-7).

2.10 In respect of the porch extensions to Nos.6 & 7, it is instructive to note that these are both recent approvals, that for No.6 being granted in 2015 (under application ref. P14/V2719/HH) and for No.7 in 2003 (application ref. 03/01376/FUL). This is an issue to which I return in Section 3.0 of this report.

2.11 Moving now to the rear of No.5 and also to what can be seen from there of its immediate neighbours at No.4 and No.6 the following observations should be made.

2.12 The first of these is that the rear elevations are private elevations that cannot readily be seen from anywhere other than from the rear gardens of the houses concerned. As
such, these elevations make no contribution to the character and appearance of the Albert Park Conservation Area as it is experienced from the public realm, it also being relevant to note here that Spring Road, onto which the long rear gardens of these houses back, falls outside the conservation area \(\text{(plate 8)}\).

2.13 As might be expected, these rear elevations are very much plainer in character than the front ‘show’ elevations of Nos.4 & 5 and Nos. 6 & 7, which were clearly designed to impress, as well as to have the benefit of views from their upper floors across Park Crescent and towards Albert Park beyond \(\text{(plate 9)}\).

2.14 There can be no denying that the rear elevations of these houses are symmetrical, as they are at the front, but they are clearly also subsidiary in their form and character, both pairs originally with a set of single-storey outbuildings clustered around their base.

2.15 These outbuildings still exist to Nos.4 & 5 \(\text{(plates 10-14)}\), although the similar arrangement that also existed at Nos. 6 & 7 has now been significantly diminished by the modern extensions at the back of both these houses \(\text{(plates 15-16)}\).

2.16 As \textit{plates 10-14} illustrate, there were until very recently two free-standing outbuildings in the rear garden of No.5 – a poor quality mid-20\(^{th}\) century brick garage under an asbestos sheet roof (see paragraph 2.9 above) and the even more modern blue-painted timber ‘shed’.

2.17 From all this, it will be clear that No.5 Park Crescent has ‘capacity for change’ through alteration or extension, provided of course that such change is sympathetic to the established form and character of the building and is not damaging to the positive contribution made by the house to the character and appearance of the Albert Park Conservation Area and Grade II Registered Park.

2.18 Given that the positive contribution made by No.5 to the conservation area and registered park derives largely from its front elevation to the road (overlooking the park itself), the focus in the application proposals has been to leave that elevation unchanged and to confine the alterations and extensions to the rear and side elevations of the house.
2.19 The extent to which the application proposals have been successful in ‘preserving’ the positive contribution made by No.5 to the character and appearance of the Albert Park Conservation Area and registered park is discussed in the next section of this report.
3.0 THE APPLICATION PROPOSALS AND THE HERITAGE ISSUES

3.1 Albert Park, which forms the basis of the Albert Park Conservation Area (designated in 1975), has also since October 1998 been included at Grade II on the Historic England Register of Parks and Gardens (see Appendix 2 for the Register Entry).

3.2 Despite the proximity of the park to No.5 Park Crescent and its neighbours, there is surprisingly little visual connection between the park and houses largely owing to the presence of this perimeter belt of mainly coniferous trees and planting on the roadside boundary of this part of the park, which even in winter effectively blocks inter-visibility between the park and houses at street level (plate 22).

3.3 Interestingly, this is a point perceptively picked up in the 1975 report to committee recommending the designation of the Albert Park Conservation Area, the report aptly quoting John Betjeman’s and John Piper’s Murray’s Berkshire Architectural Guide which summarizes the character of the area thus: ‘A monument to Prince Albert, designed by John Gibbs of Oxford, stands in the park, and shrubs and conifers hide ample Gothic houses all round it, built in North Oxford style’.

3.4 I remain firmly of the view that this almost total lack of inter-visibility between the park and the Park Crescent houses means there is no need for a detailed description of the former in this report, but this does not of course mean that the heritage significance of either the park or the houses adjoining it is in any way denied or underestimated.

3.5 Indeed, it would manifestly be a nonsense to say that Albert Park is not significant in heritage terms simply because it cannot readily be seen from the great majority of Park Crescent or from the houses lining the road around the park, in much the same way that the heritage value of the University Parks in Oxford does not derive from visibility from the Victorian houses on the adjoining Norham Gardens Estate and the wider North Oxford Victorian Suburb.
3.6 Albert Park was designed and laid out as a separate entity to the houses around it, its seclusion from them an important element of its character, which has in fact increased rather than reduced as the trees and other vegetation in around the park have grown and matured over the years.

3.7 Turning now to No.5 itself, it will be clear from Section 2.0 above and the earlier versions of this report that the heritage value of the building as part of the composition of late Victorian/early Edwardian houses along this stretch of Park Crescent has never been denied- indeed, the appellation ‘non-designated heritage asset’ would not be inappropriate for Nos.4 & 5 and their immediate neighbours – albeit it is equally clear that it does not fall into that very small category of historic buildings which cannot be altered or extended in any way without a diminution of their intrinsic heritage significance.

3.8 What this section of the report therefore considers is whether the proposed alterations and extensions to the house can be carried out without causing harm to its intrinsic heritage significance and the positive contribution the front elevation in particular makes to the character and appearance of the Albert Park Conservation Area and the adjoining registered park.

3.9 The most significant element of No.5 Park Crescent is without doubt its front elevation, which is notable not only for its own architectural value but also for its close visual relationship to No.4, with which it forms a symmetrical pair, the side or return elevations (which are visible in oblique views from the road – see plates 4 & 6) also forming a significant part of the overall architectural composition of the two houses as they are experienced from the public realm.

3.10 For these reasons, as noted in paragraph 2.18 above, the decision was taken in the original application proposals to confine the principal proposed alterations and extension to the rear of No.5, as this elevation is not visible from any significant public perspective. This approach remains central to the revised proposals.

3.11 On the rear elevation, where it was proposed to build a full-height extension, the scheme has been pared back to provide a single-storey flat-roofed extension
accommodating a family and dining room. This is designed in a simple, modern idiom in order to create an addition that is in distinct contrast to that of the original house.

3.12 In this regard this part of the extension closely follows the design cues adopted in the recently erected single-storey addition at the rear of No.6 given consent under application ref. P14/V2719/HH.

3.13 This extension, which can be clearly seen from No.5 over the brick boundary wall shared between the two properties (plates 20-21), has no openings to the brick wall facing No.5 but is fully glazed to its rear elevation (see plates 15-16), both approaches followed in the design of this part of the proposed extension to No.5.

3.14 The design and size of the proposed lean-to porch extension on the return elevation of the original house have also been amended in the revised application proposals, with the ‘wrap around’ element removed so that the back wall of the proposed porch extension sits on the same line as the back wall of the main house.

3.15 As in the original scheme, the proposed porch extension at No.5 has almost exactly the same visual impact on the view from the road, as the new porch extension has had on No.6, this impact being of a minimal nature owing to both porch extensions’ set-back locations.

3.16 As noted earlier in this report, the contribution that No.5 Park Crescent makes to the character and appearance of the Albert Park Conservation Area derives largely from the front elevation of the building and to a lesser extent from its side or return elevation.

3.17 As was the case with original application scheme and how that would be perceived from the public realm, the principal impact of the revised proposals is on the side elevation in a manner that would be broadly similar to that already pertaining at No.6 following the recent grant of consent for the porch extension there.

3.18 For this reason, the impact of the revised scheme on the heritage significance of No.5, including the contribution it makes to the Albert Park Conservation Area and
registered park, is very little different to that resulting from the recently approved and implemented scheme at the directly adjoining No.6 Park Crescent, albeit that the proposed porch at No.5 projects slightly further forward of that to No.6 (see the comparative tabulated assessment of heritage significance and impacts on the two properties at Appendix 3).

3.19 The next and related point to consider here is the importance of the original spaces between the late Victorian/Edwardian houses on this stretch of Park Crescent and the ways in which this would be affected by the revised application proposals to No.5.

3.20 The first point to make in this regard is that, as the plan at Appendix 1 demonstrates, the original spacing between the houses on the western side of Park Crescent was laid out in a way that was both generous and generally even.

3.21 This remains the case today because, despite the addition of the recent side porch extensions to Nos.6 & 7, the former being situated hard on the boundary with No.5, their single-storey form means that they are entirely subservient (as indeed they should be) to the scale and massing of their three-storey 'host' buildings, with the sense of openness between the semi-detached pairs of Nos.4 & 5 and Nos. 6 & 7 thereby maintained.

3.22 Finally, a brief word should be said here about paragraph 196 of the NPPF, which the revised Heritage Rebuttal Report provided by Heritage Places states should be 'engaged' simply because there is no 'public benefit' flowing from the revised application proposals for No.5.

3.23 It has to be acknowledged that no tangible 'public benefit' arises from the revised scheme for No.5 but neither did any such benefit result from the very similar recently approved and implemented scheme at No.6.

3.24 Furthermore, the Heritage Rebuttal Report itself fails to 'engage' with paragraph 201 of the NPPF, which must however be relevant to the Council’s consideration of the revised application proposals.
3.25 This reads as follows: ‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole’.

3.26 This revised Heritage Report (like its predecessors) acknowledges the ‘positive’ contribution No.5 Park Crescent makes to the Albert Park Conservation Area and Registered Park, albeit that this ‘positive’ contribution is effectively confined to the house’s front (street) elevation; the building will not be ‘lost’ as a result of the application proposals as they stand; and, for all the reasons set out above, the degree of ‘heritage harm’ caused by the application proposals is clearly ‘less than substantial’.

3.27 In short, the revised application scheme is, in my opinion, a commendable one, which if it is ‘harmful’ at all in heritage terms does nothing to detract from what is significant about the positive contribution that No.5 Park Crescent currently makes to the character and appearance of the Albert Park Conservation Area and Registered Park.
4.0 CONCLUSION

4.1 For all the reasons set out in the body of this report, it is clear that the proposed alterations and extensions to No.5 Park Crescent succeed in ‘preserving’ the positive contribution presently made by its front and side elevations to the character and appearance of the Albert Park Conservation Area and Registered Park.

4.2 As such, it is my professional opinion that the application proposals comply with the relevant guidance contained in the NPPF, local planning policy and, most importantly of all, meet the statutory requirements set by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
PLATES

Plate 1. No.3 Park Crescent

Plate 2. Nos.1 & 2 Park Crescent
Plate 3. Nos.4 & 5 Park Crescent

Plate 4. No.3 Park Crescent (to left) and No.4 (to right)
Plate 5. Looking towards Nos.6 & 7 Park Crescent

Plate 6. Nos.4 & 5 Park Crescent; note the garage to the rear of No.5
Plate 7. Nos.6 & 7 Park Crescent

Plate 8. Looking down the rear garden of No.5 towards Spring Road
Plate 9. Looking from directly outside No.5 towards Albert Park

Plate 10. Rear elevation of No.5 (to left) and No.4 (to right) viewed from rear garden of No.5
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Plate 17. Looking towards Nos.4 & 5 (No.6 to left) from bottom of rear garden to No.5

Plate 18. Original entrance canopy to return elevation of No.5
Plate 19. Modern porch extension to No.6; note the rat trap bond boundary wall between No.5 & No.6

Plate 20. Modern flat-roofed extension and porch extension to No.6 viewed from rear garden of No.5
Plate 21. Modern flat-roofed extension to No.6 viewed from rear garden of No.5

Plate 22: Looking towards Albert Park from Park Crescent
<table>
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<th>HERITAGE ASSETS</th>
<th>SIGNIFICANCE OF ASSET</th>
<th>ASSESSMENT OF IMPACTS ON SIGNIFICANCE</th>
<th>POTENTIAL MITIGATION &amp; RESIDUAL IMPACTS</th>
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<td><strong>POTENTIAL IMPACTS ON PHYSICAL FABRIC</strong></td>
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<tr>
<td>No.5 Park Crescent</td>
<td>Medium (non-designated heritage asset situated in conservation area, adjoining Grade II registered Park)</td>
<td>Low</td>
<td>None required</td>
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<tr>
<td>No.6 Park Crescent</td>
<td>Medium (non-designated heritage asset situated in conservation area, adjoining Grade II registered park)</td>
<td>Low</td>
<td>None required</td>
</tr>
<tr>
<td>Albert Park Conservation Area</td>
<td>High</td>
<td>None</td>
<td>None required</td>
</tr>
<tr>
<td>Albert Park Grade II Registered Park</td>
<td>High</td>
<td>None</td>
<td>None required</td>
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<p>| <strong>POTENTIAL IMPACTS ON SETTING – PHYSICAL SURROUNDINGS &amp; EXPERIENCE</strong> |                                                                                       |                                        |                                        |
| No.5 Park Crescent        | Medium (non-designated heritage asset situated in conservation area, adjoining Grade II registered Park) | Low- the application proposals maintain the building’s existing positive contribution to the character and appearance of the conservation area and the setting of the adjoining registered park as | None required                          |</p>
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<th>HERITAGE ASSETS</th>
<th>SIGNIFICANCE OF ASSET</th>
<th>ASSESSMENT OF IMPACTS ON SIGNIFICANCE</th>
<th>POTENTIAL MITIGATION &amp; RESIDUAL IMPACTS</th>
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<td>adjoining Grade II registered Park</td>
<td>perceived from the public realm</td>
<td>None required</td>
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<td>Low- the recently approved and implemented extension scheme maintains the building’s positive contribution to the character and appearance of the conservation area and the setting of the adjoining registered park</td>
<td>None required</td>
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<td>Albert Park Conservation Area</td>
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<td>Low- the impact of the application proposals for No.5 and the impact of the recently approved and implemented extension scheme at No.6 maintains both buildings’ positive contribution to the character and appearance of the conservation area as perceived from the public realm</td>
<td>None required</td>
</tr>
<tr>
<td>Albert Park Grade II Registered Park</td>
<td>High</td>
<td>Low- the impact of the application proposals for No.5 and the impact of the recently approved and implemented extension scheme at No.6 maintains both buildings’ positive contribution to setting of the Grade II registered park as perceived from the public realm</td>
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EXECUTIVE SUMMARY

1. This report sets out a rebuttal response on heritage grounds to a statement of significance and heritage impact assessment prepared by Asset Heritage Consulting in December 2018 in respect of planning application ref. P18/V2651/H, which was registered by Vale of White Horse District Council on 23rd October 2018. The application relates to the property known as 5 Park Crescent, Abingdon, OX14 1DF.

2. The rebuttal report has been commissioned by Dr. Marika Leino, joint owner of 6 Park Crescent, Abingdon. It deals with heritage matters arising from the application, but not with wider planning issues, as these lie outside its scope.

3. The report responds to documentation relating to and forming part of the planning application that was available on the planning application website of Vale of White Horse District Council during the period 17th December 2018 to 7th January 2019.

4. The report concludes that the applicant’s approach to heritage, as defined in the statement of significance and heritage impact assessment prepared by Asset Heritage Consulting, lacks rigour and authority in that:

   - It is predicated on an inadequate review of potentially affected heritage assets and a poorly developed understanding of the nature of significance in the local historic environment.
   - The extent of its impact assessment is restricted to consideration of the effect of the development proposals on views gained from certain viewpoints in the public realm.
   - Potential other viewpoints of relevance have been overlooked or dismissed.
   - No other type of impact on significance receives consideration in the document.
   - The resulting impact assessment is extremely partial, leading to flawed conclusions about the success of the application in protecting significance and its compliance with legislation, policy and guidance, including Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

5. The rebuttal report finds that, contrary to the applicant’s conclusions:

   - There are at least ten heritage assets that will potentially receive impacts from the development proposals: the designated Albert Park Conservation Area (high significance) and the Grade II Albert Park Registered Historic Park and Garden (medium approaching high significance), and the non-designated 1, 2, 3, 4, 5, 6, 7 and 8 Park Crescent (all medium significance).
   - The significance of all these receptor assets is likely to be harmed by the development. The assessed levels of harm from the development proposals are considered likely to amount to slight approaching moderate harm (for the conservation area), slight harm (for
the registered park and garden and for 1-3, 7 and 8 Park Crescent), and moderate harm (for 4, 5 and 6 Park Crescent). The cumulative effect on assets in the local historic environment is assessed as likely to amount to near-moderate harm. This would equate to a reasonably significant level of ‘less than substantial’ harm in NPPF terms.

6. In regard to NPPF paragraph 196, the planning application for 5 Park Crescent does not identify any public benefits, including heritage benefits, that could be seen in the planning balance as outweighing the ‘less than substantial’ harm that the development proposals are likely to cause to the designated Albert Park Conservation Area and the designated Albert Park Registered Historic Park and Garden. In regard to NPPF paragraph 197, in a balanced judgement, the scale of harm likely to be caused to the significance of the non-designated 1, 2, 3, 4, 5, 6, 7 and 8 Park Crescent is not warranted by anything to be found within the application.

7. In its conclusion, the rebuttal report reflects that Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 requires of local planning authorities that, in a conservation area, ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’. Case law has emphasised that there is a need for LPAs, while carrying out the planning balance, to apply considerable weight to the statutory presumption in favour of preservation or enhancement of the character and appearance of a conservation area. The application will not result in preservation or enhancement of the character, appearance or significance of the Albert Park Conservation Area. On those grounds, given the level of likely harm from the development proposals that has been unambiguously demonstrated by this rebuttal report, it is respectfully contended that the Council must determine to refuse planning application ref. P18/V2651/HH relating to 5 Park Crescent.
Dear Dr Leino

5 PARK CRESCENT – PLANNING APPLICATION REF. P18/V2651/HH

I am writing to provide you with updated heritage advice, having revisited to review the potential effect of the proposed development at 5 Park Crescent in the light of the Conservation Officer’s comments dated 31st January 2019.

In her comments, the Conservation Officer noted:

- The scheme has been modified to remove the 3 storey rear extension and single storey wrap around extensions (as described in my revised heritage rebuttal report dated 8th February 2019);
- In her opinion, the proposed demolition of the garage and shed to the rear ‘will bring positive enhancements to the setting of No 5 and to the conservation area, due to the appearance and condition of these structures’;
- Again, in her opinion, the proposed partial demolition of the monopitch element of the rear outbuilding pertaining to No 5 and the side door canopy ‘are regrettable since they both contribute towards the character/appearance and visual interest of the rear elevation and side elevations respectively. The canopy particularly is a distinctive feature extending over the door and side lights and is visible from the public domain in the conservation area’.

Thus, in her assessment, the Conservation Officer has now identified two components of the scheme that would bring benefits to the significance of the Conservation Area (demolition of the rear garage and nearby small shed) and two others that would cause harm (loss of the side porch canopy and the monopitched roofed element of the rear outbuilding on the boundary with no.4).

Looking first at the benefits she has identified from the scheme, it should be noted that demolition of the garage and shed has formed part of each and every iteration of the scheme that has been submitted to Vale of White Horse District Council, yet it is only in her most recent comments that
the Conservation Officer has deemed this to constitute a benefit to the Conservation Area. Indeed, to the contrary, in her previous comments she has stated categorically that the proposals fail to make any positive contribution to the Conservation Area. Hence, her newly stated position represents a distinct *volte face*.

I turn now to the Conservation Officer’s most recent comments on the aspects of harm that she has identified within the scheme. As I have noted above, she has now indicated that harm from the proposals will comprise the loss of the side porch canopy and the monopitched roofed element of the rear outbuilding on the boundary with no.4. As you know, in my professional opinion, the Conservation Officer has markedly underestimated the level of harm that will be caused to the significance of heritage assets from this application, and I stand by the assessment of such harm that I have made in my revised heritage rebuttal report. However, it is important to note that, in her most recent comments, the Conservation Officer has actually overlooked a key harmful element within the proposals that previously has expressly caused her concern – namely, the impact of the design of the new side porch. Importantly, the design of this porch extension has not changed from one iteration of the scheme to the next – its detailing has remained constant throughout. In her comments of 16th November 2018 and 17th December 2018, the Conservation Officer has stated clearly that the ‘new porch’ (by context, referring to the design of the new porch rather than the loss of the existing porch canopy) would contribute to the harm caused by the proposals to ‘the significance of the villa within the conservation area and…the setting of Albert Park’, whilst elsewhere within both sets of her earlier comments she has stated that ‘Views into the site from...Park Crescent [and other directions]...would be harmed by the proposals...impacting on the identified significance of No 5...the conservation area and setting of the Registered Park by means of [various stated elements of the scheme, including...the] new porch’.

In summary of the foregoing, in her most recent comments (that is, those of 31st January 2019), the Conservation Officer has:

- Overlooked an unchanged element of the scheme that she had previously expressly stated would contribute to harm that would be caused to the significance of various heritage assets, and,
- Changed her stance on the benefit accruing from another unchanged component of the proposals, finding positive enhancement of the Conservation Area from the removal of the garage in the rear garden, where previously she had concluded that the proposals failed to make any positive contribution to the Conservation Area.

During my recent re-visit to the area, I noted that the garage within the rear garden no longer exists, having been demolished before determination of the application. Accordingly, its removal cannot be considered a benefit to the Conservation Area accruing from the development proposals contained within planning application ref. P18/V2651/HH. The far smaller shed remains in place, but is entirely hidden from public view; either way, its removal or retention would not affect the character and appearance of the Conservation Area.
Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local planning authorities that, in a conservation area, ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’. On that basis, having decided that the development proposals in the application continue to include elements that would cause a degree of harm to the character and appearance of the Conservation Area, it is questionable whether the Conservation Officer should have concluded in her comments of 31st January 2019 that ‘on balance the scheme is now acceptable [subject to certain conditions]’. Paragraph 194 of the February 2019 revision of the National Planning Policy Framework is clear that ‘Any harm to...the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’. NPPF paragraph 196 sets out how to apply the planning balance in this justification process, stating that ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’. In relation to planning application ref. P18/V2651/HH, there are no public benefits that will flow from the application – the only one that has been identified by the applicant and also, rather late in the day, by the Conservation Officer was the removal of the unsightly garage in the rear garden leading to an enhancement in the character and appearance of the Conservation Area, but this can no longer be the case, given that the garage has already been demolished. As a result, it is not appropriate for the Council to conclude, as its Case Officer suggests the Conservation Officer does (see paragraph 5.13 of the Committee Report for 13th March 2019), that ‘in terms of the overall balance, the proposal would preserve the character and appearance of the conservation area’.

In the circumstances, on the basis of Section 72 of the 1990 Act and paragraphs 194 and 196 of the NPPF, the local planning authority should find that, in line with the Conservation Officer’s comments, harm will result to the significance of the Conservation Area from the application and there are no counter-balancing public benefits to be considered in the planning balance. On those grounds, the application should be refused.

Kind regards

Stephan Bond MA HonDArt FSA MRICS GradDipConsAA
Dear Dr Leino

5 PARK CRESCENT – PLANNING APPLICATION REF. P18/V2651/HH

I am writing to provide you with updated heritage advice, having now had an opportunity to review the revised Statement of Significance and Heritage Impact Assessment dated May 2019 that has been submitted recently to Vale of White Horse District Council by the applicant.

In my opinion, this revised document does not change the position with regard to the unacceptability of the applicant’s design proposal fundamentally. I stand by the detailed assessment I have made in my previous heritage rebuttal reports and in my letter to you dated 7th March 2019.

The key points that flow directly from the applicant’s revised Statement of Significance and Heritage Impact Assessment are:

i. The applicant expressly and correctly acknowledges in paragraph 3.26 of the revised document that the submitted proposal, as revised, will cause less than substantial harm to the designated Conservation Area and the designated Registered Park and Garden.

ii. Paragraph 196 of the NPPF directs that where less than substantial harm to designated heritage assets is involved, ‘this harm should be weighed against the public benefits of the proposal’ by the local planning authority in determining the application.

iii. In this regard, the applicant expressly and correctly acknowledges in paragraph 3.23 of the revised document that ‘no tangible public benefit arises from the revised scheme’.

On those grounds, the LPA is required by the NPPF to refuse the application.

I would also remind you that Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 demands of LPAs that, in a designated Conservation Area, ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’. Case law emphasises
that there is a need for LPAs, while carrying out the planning balance, to apply considerable weight to the statutory presumption in favour of preservation or enhancement of the character and appearance of a Conservation Area. In acknowledging that the current application will cause less than substantial harm to the designated Albert Park Conservation Area, the applicant is inescapably admitting that the scheme will not preserve the character and appearance of the Conservation Area, but will cause harm to it instead. Again, on those grounds, the LPA must refuse the application, if it is to comply with the duty imposed on it under S72 of the 1990 Act.

To be clear, there is no ambiguity, flexibility or ‘wriggle room’ in the legislation and policy that I have referred to above. The applicant recognises the less than substantial harm that will be caused to two designated heritage assets (in line with my own previous assessment) and the complete absence of any public benefits (outweighing or not) that will be delivered by the application. As a result, the application should be refused.

Given the foregoing, I do not feel there is any benefit at this stage in rebutting other statements made in the revised Statement of Significance and Heritage Impact Assessment, beyond reflecting in passing that:

- The revised document is incorrect in claiming that my previous heritage rebuttal report ‘fails to ‘engage’ with paragraph 201 of the NPPF’, suggesting that this is a shortcoming in my assessment. Paragraph 201 begins by referring to elements within a Conservation Area that do not contribute to its significance, which is not the case with 5 Park Crescent, as all parties including the applicant accept. The paragraph then finishes by reflecting on the loss of a building or element that does contribute to the significance of a Conservation Area, which is not what is involved in this instance. There is nothing more to say about paragraph 201 of the NPPF in relation to this application.

- In sections 3.1 to 3.6 of the applicant’s revised Statement of Significance and Heritage Impact Assessment, it is implied, though never quite stated outright, that the houses on Park Crescent do not lie within the setting of the Registered Park and Garden because inter-visibility between the two is partially obscured in summer by trees in the park. That is an untenable argument in heritage terms. Setting is the ‘surroundings in which a heritage asset is experienced’ according to the NPPF. It is not simply about inter-visibility. There is an intimate historical and physical designed relationship between the park and the surrounding houses, which forms a fundamental part of the experience of the park in the locality. The boundary of the Registered Park and Garden directly abuts the front boundaries of nos 4, 5, 6 and 7 Park Crescent and neighbouring houses. These houses are visible from inside the park’s perimeter beneath and between the trees, even in the height of summer. There can be no question that 5 Park Crescent lies in the immediate setting of the designated Albert Park Registered Park and Garden – any other conclusion is indefensible.

I hope the foregoing advice is clear, but please do not hesitate to contact me if you require further amplification.
Kind regards

Stephen Bond MA HonDArt FSA MRICS GradDipConsAA
APPLICATION WEB COMMENTS FORM

Information available for public inspection and available on our website

Location : 5 Park Crescent Abingdon OX14 1DF
Proposal : Erection of single storey side and rear extensions (Description as amended by email received from agent dated 21 January 2019 and submission of amended plans and revised supporting information) (As updated by a revised Statement of Significance & Heritage Impact Assessment submitted by the agent dated 16 May 2019).
Application Reference : P18/V2651/HH - 12

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<td>Abbey House</td>
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Use the space below for your comments

Application Number: P18/V2651/HH
Description: Erection of single storey side and rear extensions (Description as amended by email received from agent dated 21 January 2019 and submission of amended plans and revised supporting information) (As updated by a revised Statement of Significance & Heritage Impact Assessment submitted by the agent dated 16 May 2019).
Location: 5 Park Crescent Abingdon
Site Constraints: Cons Area: Abingdon Albert Park Conservation Area

Background:
The key issues addressed by Stephen Bond in the Rebuttal Report and letter are:
- The Statement of Significance and Heritage Impact Assessment prepared by Asset Heritage Consulting in December 2018, were inadequate in terms of assessment of the significance of assets and views affected by the proposals and the impacts upon them.
- Contrary to the Asset Heritage Consulting opinion, Stephen Bond concluded
that a number of assets would be harmed by the proposals, including Albert Park Conservation Area, Grade II Albert Park Registered park and garden and 8 non designated heritage assets in Park Crescent. This harm was stated as equating to less than substantial harm in NPPF terms. (paragraph 196)

The planning application for 5 Park Crescent does not identify any public benefits, that could be seen as outweighing the less than substantial harm identified as necessary under paragraph 196.

That there is a requirement for the council under s 72 of the Planning (Listed Buildings and Conservation) Areas Act 1990: special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. Stephen Bond concluded that his report had unambiguously demonstrated the application would not result in the preservation or enhancement of the character or appearance of the Albert Park Conservation Area and rather would harm the conservation area.

Key issues addressed by Karen Howe of DAC Beachcroft in a letter of 8th March 2019 are:

Procedural aspects which DAC Beachcroft believes had not been fully carried out with respect to the need to assess the significance of heritage assets and their settings and the impacts on them.

The discrepancy in the Conservation/Design Officer’s responses between the original response where less than substantial harm was found for the 3-storey wrap around extension and a recommendation of support for the amended proposal with a single storey extension with reduced footprint for the side extension and change in the design of the porch- due to the lack of re-assessment of the matters previously considered unacceptable or harmful.

Key points covered in the Asset Heritage Consulting, Revised Statement of Significance and Heritage Impact Assessment, May 2019 which includes:

More information on the heritage significance of Albert Park and the relationship of the Park Crescent Houses to it.

A comparative assessment of the significance and impact on that significance of Nos 5 and 6 Park Crescent in table form.

An assessment of the importance of the original spaces between the late Victorian/Edwardian houses on Park Crescent.

Consultation Response:

The above reports, letters and updated analysis are acknowledged and have been carefully considered. During the course of the application I have taken into account various amendments to the scheme with respect to my original and subsequent comments. For ease of reference the various iterations and updates are listed as follows:

- 2018/9/24 The original scheme included a rear 3-storey plus single storey wrap around side and rear extensions, a flat roofed porch and the removal of a dilapidated garage and shed.

- 2018/11/7 Amendments to the proposals include the porch roof being changed from a flat roof to traditional lean-to; the wrap around element of the extensions removed; but the 3-storey extension remained.

- 2018/12/6 Visualisations are produced showing a lean-to roofed porch with post but the 3-storey rear extension remained.

- 2019/1/21 The extent of the side extension and length of the porch are reduced to terminate at the line of the rear wall of the main building; the 3-storey extension is reduced to a flat roofed single storey extension; the shed
and garage are proposed for removal.

Notwithstanding my previous consultation responses my revised views are as follows:

No 5 Park Crescent is identified by Asset Heritage Consulting (AHC) as a non designated heritage asset of medium significance. The significance of the building is as one of a pair of Gothic style villas, together with No 4, which form part of the crescent shaped residential housing development in the periphery of Albert Park. Nos 4 and 5 are among the later houses to be built around the Park and are probably the work of the architect Edwin Dolby’s pupil, JGT West, being erected in 1902-3. Details include steeply pitched roofs, brick construction with mock timber-framing on the frontage and barge boards. According to AHC although attractively designed and well built, villas Nos 4 and 5 and 6 and 7 are not architecturally remarkable in comparison to some of the more interesting, idiosyncratically designed houses on the northern side of Park Crescent.

The Park and the associated housing were laid out in the 1860s, as conscious town planning with the plots fanning back from an estate road bounding the Park. Spaces between the buildings allow glimpsed views of flank walls between pairs of houses and of the garden plots to the rear. The staggered layout and siting of the pairs of villas on the south west of the crescent is part of the conscious design for the crescent, with the flank entrance to No 5 forward of that of No 6 of the neighbouring pair Nos 6 and 7 to the north. AHC states that the rear of the properties are plainer in character and have attached single storey service buildings with pitched roofs and spacious garden plots. In effect there is a hierarchy of design significance in that the front elevations of the pairs of villas are symmetrical show elevations, clearly designed to impress, as they front on to Park Crescent and are visible from the public domain. In addition they have views from their upper floors across Park Crescent and towards Albert Park beyond. The rear elevations are also symmetrical, but are clearly subsidiary in terms of plainer form, character and materials and can barely be seen from Spring Road to the rear of the gardens. The side elevations are lesser in terms of hierarchy of significance being side or flank elevations leading to the rear/service buildings and gardens of the properties, albeit the mock timber-framing to the front gables wraps around that part of the flank walls glimpsed from the public domain.

Under the amended proposals the 3 storey rear extension and flat roofed wrap around porch extension are modified- the 3 storey extension being replaced by a single storey flat roofed rear extension, the porch modified to a traditional single pitch design, mirroring that of the single pitched porch approved on No 6 adjacent and the extent of the side extensions brought in line with the rear wall. The three storey extension plus wrap around porch, caused harm, in NPPF terms- less than substantial harm- by means of the extent and type of change, which impacted adversely on the architectural form and detailing of the villa and detracted from the design aesthetic of the villa pair.

In my view the rear single storey flat roofed extension better respects the design of the main house, and the neighbouring part of the pair, retaining the form, features and articulation of the rear elevation and service building. The flat roof minimises impact and preserves the character of the rear elevation. The contemporary design contrasts with the traditional Victorian gothic style,
complementing the rear elevation. The rear service building is retained, albeit with a later 20th century extension removed. An unsightly garage and dilapidated shed are removed. (These have already been removed). The side porch extension, brought in and given a traditional single pitch as opposed to flat roof, is well designed and better respects the pitched roof form of the main villa, as seen from public viewpoints in Park Crescent. The villas were designed to be stepped or staggered in their alignment to Park Crescent and therefore the side entrance to No 5 is forward to that of No 6 adjacent - the proposed new porch as presented to the existing side entrance side door is necessarily forward. However, the overall change in appearance when viewed from Park Crescent would barely be discernible. The proposed lean-to porch would practically mirror the design and physical appearance of the porch permitted at No 6.

The space is not compromised between the buildings as the lean-to element does not significantly impact on the space between the buildings nor views to rear plots. Glimpsed views between the buildings and to the rear plots are maintained. In my view the revised proposals preserve the character and appearance of the building.

Albert Park a grade II Registered Park and Garden, forms the basis of the The Albert Park Conservation Area and both are identified by AHC as of high significance, as heritage assets of national significance. The key significance of Albert Park is as a Victorian park of compact symmetrical design, laid out in the 1860s along a north/south axis with a central open lawn enclosed by a perimeter shelter belt containing many mature deciduous and coniferous trees, probably part of the original 1860s planting. The D shaped Park is bounded by an estate road beyond which lie substantial individually designed houses in their own spacious plots on the north and east and pairs of villas on the west. The key significance of the conservation area encompasses that of Albert Park, being an area characterised by Victorian suburb development with Albert Park at the centre.

Nos 5 and 6 Park Crescent lie in the setting of Albert Park, within the conservation area. As noted in the AHC Revised Statement of Significance there is surprisingly little visual connection between the Park and the houses largely owing to the presence of the perimeter belt of coniferous trees and planting on the roadside boundary of the west side of the Park. Given that the overall concept and design of the Park remains unchanged as is the front elevation of No 5 presenting to Park Crescent and the design and extent of change has been pared back and impacts reduced, such that they are minor with only low impact, my view is that the scheme maintains the positive contribution of No 5 to the setting of the grade II Registered Park as perceived from the public realm.

In my view the amended proposal preserves and does not harm the character and appearance of No 5 Park Crescent and correspondingly preserves and does not harm the character and appearance of the conservation area. The positive contribution that No 5 makes in retention of the essential elements of the Gothic design and built form of the principal elevation to the character and appearance of the conservation area is maintained; the minor extension to the side and rear extension have low impact in the public realm; and spaces and
views between buildings are maintained— the latter allowing glimpsed views between the buildings of the flank walls and towards rear gardens. There is no discernible difference between views when the garage existed and the present single pitch roof to the proposed porch extension.

It is acknowledged that there is no up-to-date conservation area appraisal for Albert Park Conservation Area. However, this application has been considered with regard to the significance of the conservation area, as outlined above and in line with Historic England’s Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (2016). In accordance with paragraph 190 of the NPPF, the significance of the designated conservation area and other assets have been assessed and the potential impact of the application scheme on the heritage assets has been duly considered.

Summary
No 5 is a non designated heritage asset, located in the Albert Park Conservation Area and in the setting of grade II Registered Albert Park. The main contribution of No 5 to these assets is as part of the conscious 1860–1900s town planning and Gothic style estate design, in the essential scale, form, massing, materials and overall appearance rather than in individual details. For the reasons given above my view is that the amended proposals have mitigated impacts such that the character and appearance of the Conservation Area, Park and No 5 are preserved. The removal of the dilapidated garage and shed, which were detracting features, visible through the gap between buildings, have enhanced the setting of the asset. There is no harm caused by the proposals.

Recommendation:
No objection to the proposals subject to details of materials, windows and doors at 1:10, rainwater goods

Sally Stradling
Conservation/Design Officer