



Donald Insall Associates

Chartered Architects and Historic Building Consultants

**L'Oscar (former Baptist Church House,
2-6 Southampton Row, London WC1**

Heritage Statement
For L'Oscar

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1.0 Summary of Heritage Statement

1.1 Introduction

Donald Insall Associates was commissioned by L'Oscar in March 2023 to accompany proposals by TP Bennett to adjust the location of a previously-consented opening in the party wall at ground level to link the former Baptist Church House with the neighbouring unlisted former bank at 118-120 High Holborn. The proposals also include additional works to the exterior of 118-120.

The investigation has drawn from historical research originally carried out by Insalls in 2007 for a historic building report to accompany a major repair and redevelopment scheme when the building was first converted into a hotel. Insalls were also involved with recent discussions with the London Borough of Camden and have carried out additional archival investigation and further site inspections. A brief illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the select site survey is in Section 3. The significance of the building is set out in Section 4. Section 5 provides a justification of the interventions according to the relevant legislation, planning policy and guidance.

1.2 The Buildings, their Legal Status and Policy Context

The former Baptist Church House together with its chapel is a Grade II* listed Edwardian building located in the Kingsway Conservation Area in the London Borough of Camden. 118-120 High Holborn is an unlisted former bank premises which is considered to make a positive contribution to the character and appearance of the Kingsway Conservation Area.¹

The statutory list description of the listed building is included in Appendix I and guidance on the Kingsway Conservation Area provided by the local planning authority is in Appendix II along with extracts from the relevant legislation and planning policy documents. The key policies are summarised below.

- The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. The Act imposes statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have '*special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses*'
- Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the Site comprises The London Plan (March 2021).

¹ See London Borough of Camden *Kingsway Conservation Area Statement* p15 <https://www.camden.gov.uk/documents/20142/7871262/Kingsway.pdf> [Accessed March 2023]

- Policy HC1 Heritage Conservation and Growth of The London Plan (March 2021) stipulates that *'(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings...*
- Camden has policies that deal with development affecting the historic environment, **DP25 f)** notes the authority should *'only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building;'*
- The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework 2021 (NPPF) will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6).

At the heart of the Framework is *'a presumption in favour of sustainable development'* and there are also specific policies relating to the historic environment. The Framework, in paragraph 194, states that: *'In determining applications, local planning authorities should require an applicant 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 proposal on their significance.'* Section 4 of this report – the assessment of significance – meets this requirement.

The Framework requires that local planning authorities categorise harm as either 'substantial' or 'less than substantial'.

Where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, the Framework states, in paragraph 202, that: *'...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

2.0 Brief Historical Background

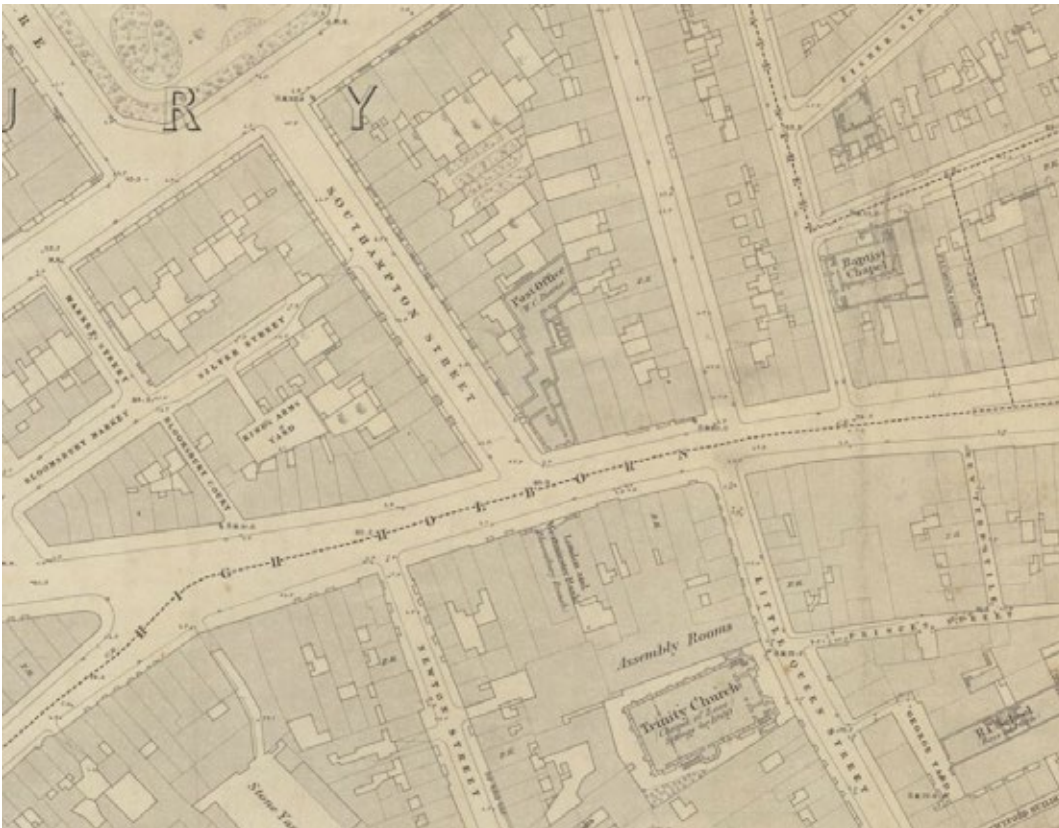
2.1 The Development of the Surrounding Area

In November 1897 London County Council's (LCC) Improvements Committee acquired property in Southampton Row and Kingsgate Street in order to widen Southampton Row between Theobald's Road and High Holborn.² .

The LCC's plan was part of a wider programme to redevelop multi-occupational slum dwellings and rehouse the residents in purpose-built flats. To aid this ambition the new street was planned to form 'commanding sites fronting the widened thoroughfare of Southampton Row with a view to valuable recoupment.'³ Kingsgate Street, running parallel to and a short way east of Southampton Row, together with its long established Baptist chapel, disappeared as part of the scheme. However, Baptist Church House - with its chapel to the rear - was the first building to be constructed on the newly-widened Southampton Row. **[Plates 2.1 and 2.2]**

2 This scheme predated the formation of Kingsway and Aldwych, which were subsequently laid out as part of a general improvement between the Strand and Holborn.

3 See Kelsall, 1982.



2.1 Ordnance Survey map, surveyed 1871 and published 1875 (NLS)



2.2 Ordnance Survey map, surveyed 1911, published 1912 and reprinted 1944 (NLS)

2.2 The Building

2.2.1 The Baptist Union and the idea of a headquarters building

The Baptist Church is an umbrella term for a number of independent churches which gathered together during the nineteenth century. In the early part of the century the largest of these was the Baptist Missionary Society, but this organisation was gradually supplanted in influence by the Baptist Union. Throughout the century the Baptist Union gradually absorbed other Baptist denominational societies, including the Home Mission Society and the New Connection. The growing Union set up an annuity fund, followed by a Church Extension Fund in 1893. In 1898 Baptist Union secretary Reverend John Howard Shakespeare launched a campaign to raise £250,000 for denominational use. As the Baptist Union relied for its office space on rooms at the Baptist Missionary Society's offices in Fournival Street, some of these funds were earmarked for a new Baptist Union headquarters in London.

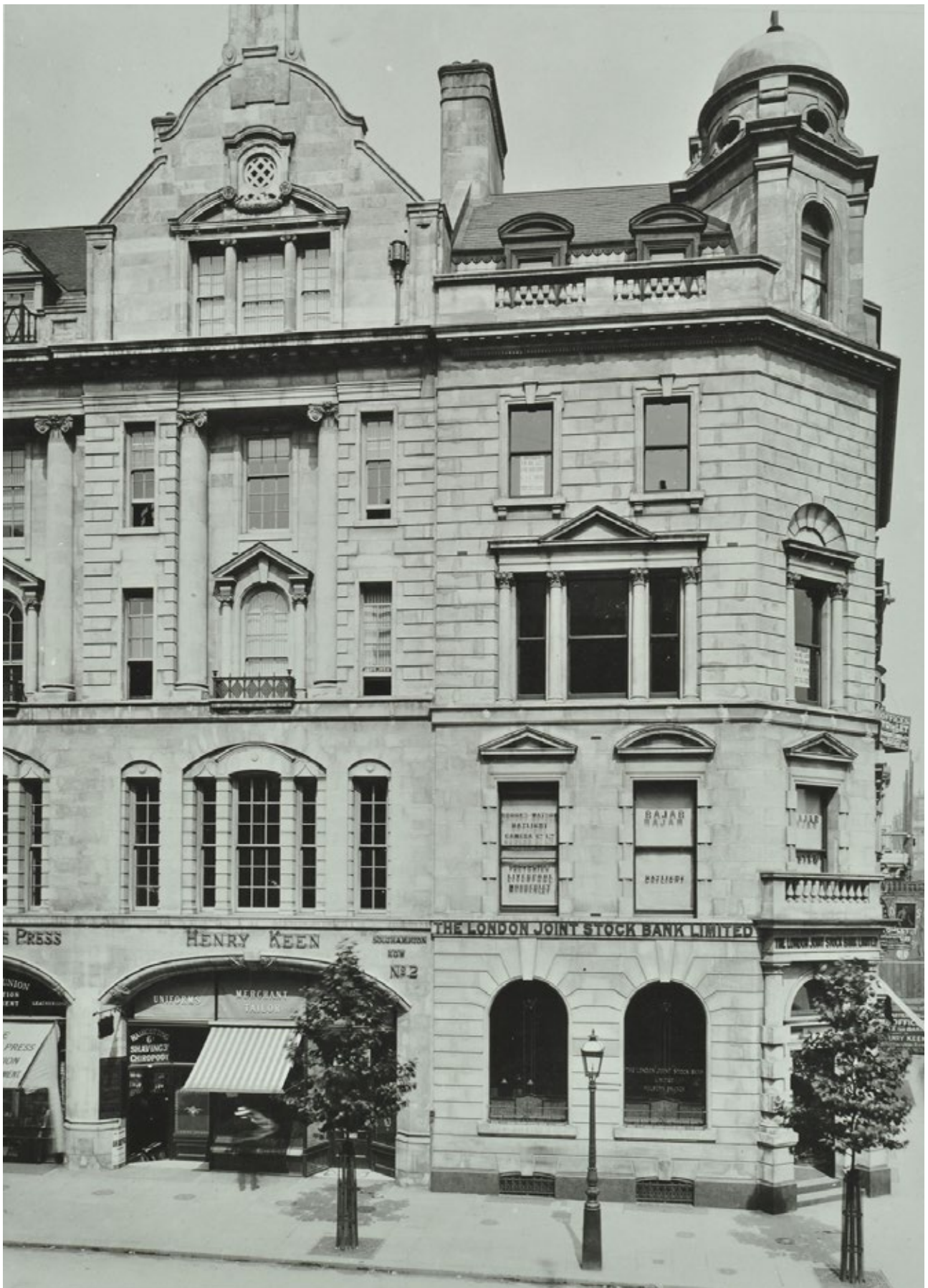
2.2.2 The Building's Origins

At the end of the nineteenth century the LCC's plans for slum clearance and the redevelopment Southamton Row brought them into negotiation with the trustees of Kingsgate Chapel. In February 1899 the chapel's trustees agreed to hand over its property to the LCC for its road widening scheme in exchange for £1,700 and sufficient land to build its new headquarters fronting Southamton Row, with a new chapel adjoining to the rear. Formal conveyance of the land, with a frontage of 80ft to Southamton Row and a depth of 140ft, took place in 1901.

The foundation stone of Baptist Church House was laid on 24 April 1901 by Dr Alexander Maclaren, president of the Baptist Union. Plans drawn up by architect Arthur Keen were formally approved by the LCC in May 1901 and the building was constructed by Higgs and Hill leading London builders (who attended the Metropolitan Tabernacle, London's largest Baptist church) The new building was completed in 1903 and its neighbour at 118-120 shortly after. **[Plates 2.3, 2.4]**



2.3 1901 drawing of Baptist Church House (Archiseek)



2.4 1904 photograph of Baptist Church House (left of image) and 118-120 High Holborn (LMA 74873)

2.2.3 Baptist Church House

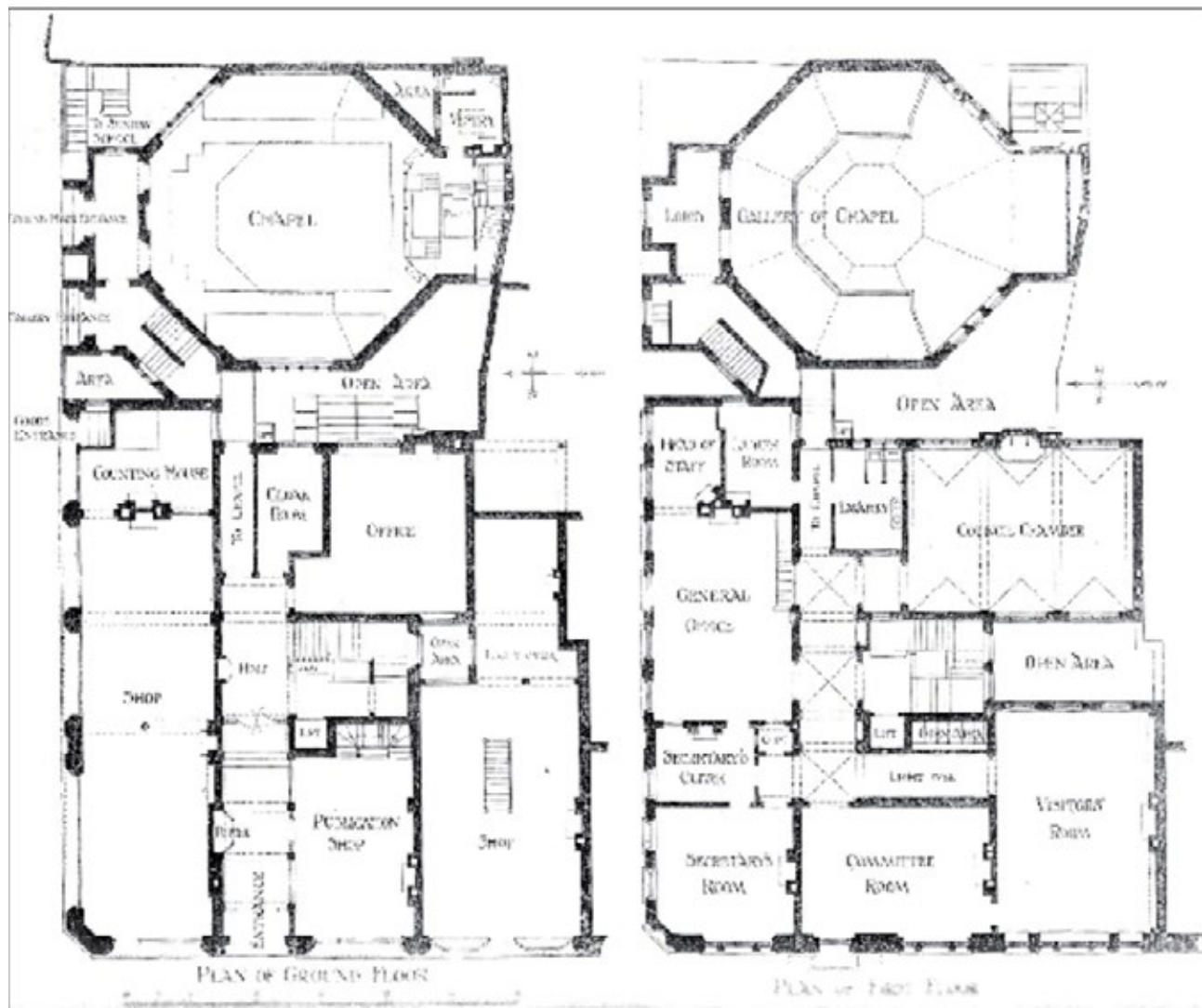
Plans from the *Builder* of 1901 show the layout of the ground and first floor. [Plate 2.5] Accommodation was ranged around a central stairwell, with a corridor connection to the chapel behind. Oak panelling and inlaid woodwork was used 'freely' in the principal rooms, according to an account in the *Architectural Review* of 1908. The corridors were paved with black and white marble tiles, and had groin-vaulted ceilings.

Ground Floor

The entrance hall led then, as now, to the main stairwell, beyond which a corridor connected to the chapel. A cloakroom and office filled the area to the right of the connecting corridor, between the stairwell and the chapel wall. The staircase to the first floor was of Hopton Wood stone, with teak balustrades. To the right of the ground floor main entrance was a shop selling Baptist publications, later known as the Carey Kingsgate Press.

South of the Kingsgate Press, at number 2 Southampton Row, was a tailor's shop occupied by Henry Keen, a relative (possibly a brother) of the architect. To the left of the main entrance was originally a porter's office and a large, tenanted shop. Under the ground floor was a large basement.

2.5 1901 ground and first-floor plans (*The Builder*)



First Floor

On the first floor, overlooking Southampton Row, were the visitors' room, committee room and the secretary's room. Above the fireplace in the visitors' room was a Doulton terracotta panel by George Tinworth. The panel, representing a scene from Bunyan's *Pilgrim's Progress*, was entitled 'Freedom from Sin.' East of the secretary's room was a small office for the secretary's clerk and, beyond, a large 'general' office.

South east of the stairwell – filling one corner of the building – was the council chamber, measuring 35ft by 26ft. In 1939, when the council chamber was moved to the first floor of the chapel, this room was renamed the Shakespeare room, after the former Union secretary who helped raise the funds to build Baptist Church House. A plaque in the Shakespeare room commemorates the connection. The council chamber also featured a Doulton terracotta panel by George Tinworth which depicted the liberation of enslaved Jamaicans in 1834, following the passing of the Act to abolish slavery in the British Empire (see also section 2.5 and site survey in section 3.0).

Second Floor

The second floor originally housed the offices of the *Baptist Times* and the Baptist World Alliance, formed in 1905. Also on the second floor was the 46ft by 26ft library, with panelled cabinets around the walls containing niches filled with busts of former Baptist Union presidents. This room has an ornately-plastered ceiling by Lawrence Turner. Turner modelled all the plaster ceilings in Baptist Church House apart from the dome of the chapel, whose plasterwork was by Richard Garbe.

Third, Fourth and Fifth Floors

In 1953 the third floor of the building housed the offices of the London Baptist Association, the London Baptist Property Board, the Baptist Insurance Company and the Baptist Holiday Fellowship. Fourth floor offices were occupied by the Baptist Commonwealth and Colonial Society and the Baptist Lay Preachers' Federation. The top floor was occupied by a caretaker's flat.

Chapel

The double-height chapel was octagonal in plan, with a domed roof and gallery which stretched around much of the room's circumference. The basement of the chapel housed a Sunday School. The panels at the base of the dome featured various trees mentioned in the Bible, and were modelled by Garbe.

2.3 Alterations, WWII, and Post War Decline

In 1939 the chapel was divided at gallery level in order to create a new committee room. The lower part remained a chapel, with new windows in the southwest and southeast walls to match the existing window in the northeast wall. The upper floor was used as the new council chamber, with alterations to existing windows and the introduction of new oak panelling carried out to designs by R. Mountford Piggott FRIBA.

On 25 September 1940 incendiary bombs destroyed the roof and the top floor of the building, and damaged the fourth floor offices. By 1948 the fourth floor offices had been repaired and the caretaker's flat, above, had been rebuilt. That year, the press moved to premises on the left hand side of the entrance (occupied until the late 1930s or possibly until after the war by a restaurant belonging to the Aerated Bread Company). The vacated shop was then let to tenants.

In 1953 Payne wrote that there had been few changes in the layout of the original Baptist Church House, 'the building having proved itself well adapted to the needs of the denomination. The Baptist Alliance headquarters moved to Washington in the late 1940s, but in 1953 Payne describes the now-regional office still as 'an important centre of world Baptist contacts and activities'.⁴

By 1961, however, there were only 12 worshippers at the chapel on a Sunday morning, and 18 in the evenings. The chapel closed soon afterwards, and alterations were made to convert the building for use by the Carey Kingsgate Press. The basement Sunday school was converted into a staff canteen in 1963.

Various redevelopment schemes were considered for the building in the 1970s and 1980s, but no major reconstruction work was carried out. By 1982, however, it does appear that the building was already linked with 118-120 High Holborn – see section 2.6 below. Baptist Church House was sold to London Transport in 1989 following the Baptist Unions' move to Didcot in Oxfordshire.⁵ Plans create a new Holborn entrance to Crossrail, however were abandoned and the building was used as a homeless hostel for many years and placed on Historic England's 'Heritage At Risk' Register. The building was eventually sold to a property developer who converted it into a hotel. A subsequent operator has branded the hotel around the flamboyant 19th century English writer, Oscar Wilde.

5 https://baptisttimes.co.uk/Articles/524435/Mixing_pietty_and.aspx
[accessed March 2023]

2.4 Architect and Craftsmen

2.4.1 Arthur Keen (1861-1938)

Arthur Keen was articled to and later assistant to the renowned Arts & Crafts architect Richard Norman Shaw. Keen's first independent practice was shared with Ernest Newton. His principal work was domestic architecture, mostly in Surrey but also in London. He also built schools, offices, factories and churches, including Cricklewood Baptist Church NW2. Keen designed 114-115 High Holborn for the tailor Henry Keen and Ruskin House, SW1, for Morris and Company. In 1930 he published a book on Charing Cross Bridge. According to his *Builder* obituary he was 'a great admirer of Christopher Wren' and campaigned to preserve his City churches. He was also co-founder of Kenton & Co, which made furniture, textiles and associated crafts.

2.4.2 Lawrence Turner (1864-1957)

Lawrence Turner worked for various major architects including G F Bodley, collaboration with whom resulted in (among other work) the elaborate ceiling at Powis Castle. For Sir Herbert Baker Turner worked on commissions at Rhodes House in Oxford, Downing College Cambridge, Winchester School, South Africa House and Church House, Westminster.

When the *Architectural Review* published a special focus on craftsmanship in 1926 Turner was the author of the section on masonry and stone carving. His work also featured in other sections of the issue, including woodwork. Turner lectured widely on his subject, became an honorary associate of the RIBA in 1925, was a member of the Art Workers' Guild from 1891 and wrote a study of English historical plasterwork.

2.4.3 Richard Garbe (1876-1957)

Garbe trained at the Central School of Arts and Crafts and the Royal Academy Schools where he was influenced by the New Sculpture movement, and especially by Gilbert and Frampton. From 1901 to 1929 Garbe taught at the Central School, close to Baptist Church House, and from 1929 to 1946 he was professor of sculpture at the Royal College of Art. He was elected an RCA academician in 1936. Garbe's architectural sculpture includes work at the National Museum of Wales and Thames House, at the north end of Southwark Bridge.

2.4.4 George Tinworth (1843-1913)

Born in London, Tinworth was initially apprenticed to his father as a wheelwright, but enrolled at Lambeth School of Art in 1861. His success as a modeller allowed him to enter the Royal Academy Schools in 1864. Tinworth joined the Royal Doulton Potteries, Lambeth, in 1867, and remained there until his death in 1913. He was given special status by the firm; Tinworth had his own studio and assistants and was also allowed to undertake external commissions.

He exhibited at the Royal Academy between 1866-85 where his work attracted the attention of John Ruskin. This led the architect, George Edmund Street to commission a large crucifixion panel for the reredos at York Minster (1876), twenty-eight panels for the Guards' Chapel, Wellington Barracks (1878). There followed many other commissions for ecclesiastical works. Although Tinworth was chiefly known for his religious pieces, he was also commissioned to produce some public statuary, including the terracotta statue of Henry Fawcett in Vauxhall Park. Tinworth was made an officer of the French and American Academies, and received many other medals and prizes. A large collection of his work is held at the V & A.⁶

2.5 The Baptist Church and the Campaign to Abolish Slavery

The Baptist Church were prominent campaigners for abolition. In the early 1830s an English missionary preacher at the Baptist Church in Falmouth Jamaica, William Knibb, together with other members of the church, including an Afro-Caribbean deacon Samuel Sharpe, had been involved in protests against the colonial authorities. This culminated in a protest initially known as the Christmas Rebellion and later the Baptist War. Knibb returned to Britain and continued his campaign, giving evidence to the British parliament. Sharpe, however, was executed by the Jamaican authorities. Following the passing of the Slavery Abolition Act in 1833 Knibb returned from Britain to Jamaica, opening up schools, repairing churches and establishing a Free Village scheme to house former plantation workers.⁷

The terracotta panels in the visitors' room and the council chamber were both donated in 1903 by a Scott Durant, a Baptist from Westbourne Park. The Durant family were prominent plantation owners in the British Caribbean but it is not known if there is a connection.⁸ It is however, perhaps notable that in 1902 - the year the panels were commissioned - also saw the publication of an edition of John Bunyan's *Pilgrim's Progress* (the inspiration for the panel in the visitor's room) illustrated with images of African villagers rather than westerners.⁹

2.6 118-120 High Holborn

118-120 High Holborn was designed by architect C. Harrison as the headquarters of The London Joint Stock Bank in the early part of the 1900s. Upper floors were occupied soon after by George Edward Skerry who located his college there from its Chancery Lane headquarters. Skerry College specialised in the education of young men into military and naval trade as well as training for civil service positions. **[Plates 2.6, 2.7]** During WWII, the building, like most of its neighbours, suffered heavy bomb damage and had to be extensively repaired. A 1948 photograph shows the repaired building **[Plate 2.8]**. A number of signs were attached to the High Holborn façade

6 Mapping of Sculpture https://sculpture.gla.ac.uk/view/person.php?id=msib4_1255620262 [Accessed March 2023].

7 See Peter Masters, *Missionary triumph Over Slavery: William Knibb and Jamaican Emancipation*, Wakeman Trust, London, 2006. The official archive for Knibb, formerly held by the Baptist Missionary Society, is held by the [Regents Park College](#) Library, Oxford.

8 See <https://www.ucl.ac.uk/lbs/search/Durant> [Accessed March 2023].

9 See Hofmeyr, I. (2002). Dreams, Documents and 'Fetishes': African Christian Interpretations of The Pilgrim's Progress. *Journal of Religion in Africa*, 32(4), pp 440-55.



2.6 1929 photograph of the main entrance of 118-120 High Holborn (LMA 72749)

advertising Zenith Watches and Thomas H. Taylor, an accountant. It is likely that the clock which is shown in the photograph and remains on the corner façade today was installed by Zenith Watches.

The building appears to have been linked to the former Baptist Church House in the post war years. Note of a planning appeal made by the Baptist Union in 1982 (the year Baptist Church House was first included on the statutory list of buildings of buildings of 'special' architectural and historical interest) refer to 'shops at ground floor level either side of the entrance' and 'offices of the Guardian Building Society on the ground floor at the south-west corner interconnect with offices in the adjoining building to the south.'¹⁰ A photograph of the first floor visitor's room of Baptist Church House that year **[Plate 2. 9]** and a blueprint basement plan of 1977 **[Plate 2.10]** confirm that there were openings in the party wall between the two buildings post WWII.

10 Source: GLC/London Borough of Camden – Appeals by The Baptist Union of Great Britain and Ireland (APP/5008/A/82/1947, APP/5008/E/82/49, APP/5008/A/92/7162 and APP/5008/E/82/198)



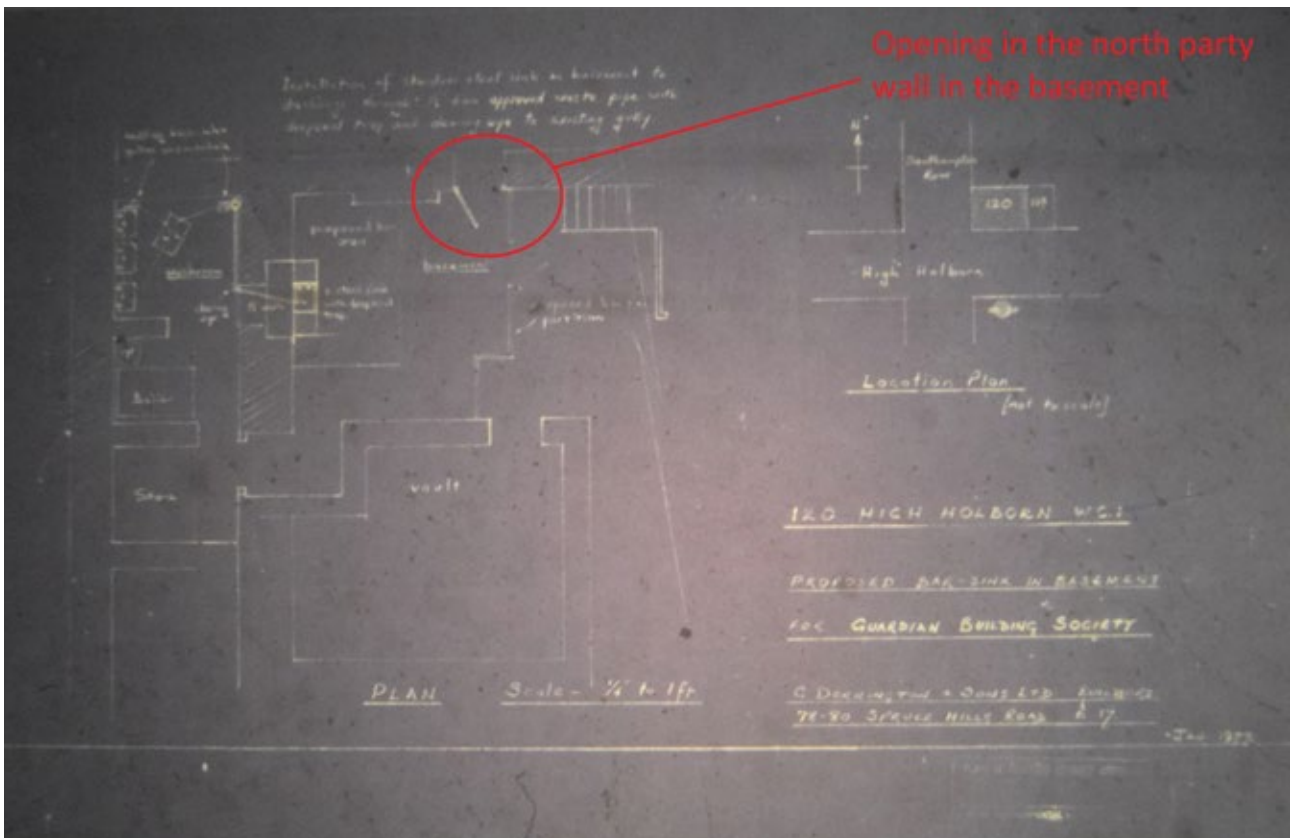
2.7 1904 photograph of the High Holborn elevation of 118-120 High Holborn (LMA 72727)



2.8 1948 photograph of 118-120 High Holborn, with advertisements (LMA 72757)



2.9 First-floor visitors room in 1982 showing door in party wall to 118-120 (Camden Archives)



2.10 Basement plan of the former bank showing opening in party wall - (Camden Archives)

2.7 Recent Planning History

2007/5206/L Approved 10 April 2008

External and internal alterations including conversion of the former Baptist Church Headquarters to create 84 bedroom hotel with restaurant, conference room, meeting/banqueting room, bar, spa and gym.

2007/5204/P Approved 30 May 2008

Conversion and alterations of the former Baptist Church Headquarters to create 84 bedroom hotel (Class C1) with restaurant, conference room, meeting/banqueting room, bar, spa and gym.

2012/5592/P Approved 26 November 2012

Reduction in the number of hotel rooms and various external alterations to the building, as amendments to planning permission ref 2007/5204/P dated 30/05/2008 for conversion and alterations of the former Baptist Church Headquarters to create 84 bedroom hotel (Class C1).

2012/5591/L Approved 14 December 2012

Alterations in connection with the reduction in hotel room numbers and alterations to design of chapel, ground floor entrance, hotel bedrooms, circulation and lifts, and internal fixtures, fittings and servicing, as an amendment to listed building consent 2007/5206/L dated 10/04/2008 for external and internal alterations including conversion of the former Baptist Church Headquarters to create 84 bedroom hotel [Class C1].

2013/3570/L Approved 9 August 2013

Details of detailed plans, drawings of details of external windows and doors, internal doors, architraves and screens, proposed glazed link, internal elevations, details of all historic features that are to be removed and relocated (fire places, doors and windows), details and sections of shop front designs, schedule of finishes, relocation of original panelling in Room P10 and a method statement required by conditions part 4, 7, 8, 10, 12, 15, part 17c, part 17d, 18 & 19 of listed building consent granted on 14/12/2012 (Ref: 2012/5591/L for the alterations in connection with the reduction in hotel room numbers and alterations to design of chapel, ground floor entrance, hotel bedrooms, circulation and lifts, and internal fixtures, fittings and servicing, as an amendment to listed building consent 2007/5206/L).

2013/5020/L Approved 5 September 2013

Reinstatement of historic mezzanine at the eastern end of room 1.03/4 at first floor, and alterations to room layout at sixth and seventh floors as an amendment to listed building consent (ref:2012/5591/L) dated 14/12/2012 for external and internal alterations including conversion of the former Baptist Church Headquarters to create 84 bedroom hotel.

2014/4981/L Approved 5 September 2014

Details of method statement as required by condition 3 of listed building consent (2012/5591/L) dated 14/12/2012 for alterations associated with the conversion of the former Baptist Church Headquarters to hotel.

2014/4982/P Approved 10 February 2016

Variation of condition 6 (relating to opening hours of the ancillary restaurant and lounge/bar use) as required by planning permission (2007/5204/P) dated 30/05/2008 for conversion and alterations of the former Baptist Church Headquarters to hotel.

2022/1386/P Approved 1 February 2023

Change of use of basement, ground floor and mezzanine to hotel use in association with adjoining hotel at 2-6 Southampton Row, relocation of existing clock to 3rd floor level, new window at 1st floor level fronting High Holborn, installation of 6 new windows at roof level and installation of skylight and lift over-run on roof.

2022/1915/L Approved 1 February 2023

Internal alterations (formation of openings at basement and ground floor to link to neighbouring 2-6 Southampton Row) in association with the change the use of the lower levels of 118-120 High Holborn to hotel use associated with the existing hotel at 2-6 Southampton Row.

2.6 Bibliography**London Metropolitan Archives**

Photographs Collection
Maps Collection
Plans

Angus Library, Regent's Park College

Plans from 1944 and the 1980s
Photographs from 1901-1965

72727. Photograph of 118-120 High Holborn. 1904. London Picture Archive.

72749. Photograph of the main entrance of 118-120 High Holborn. 1929. London Picture Archive.

72757. Photograph of the 118-120 High Holborn. 1948. London Picture Archive.

74873. Photograph of 2 Southampton Row and 120 High Holborn. 1904. London Picture Archive.

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The Builder, 16 August 1902, p148

The Builder, Obituary of Arthur Keen, 23 December 1938

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Drawing of Baptist Church House. 1901, <https://www.archiseek.com/2014/1901-baptist-church-house-southampton-row-london>

[Accessed April 17, 2023]

3.0 Site Survey Descriptions

3.1 The Setting of the Buildings and the Conservation Area Context

Baptist Church House is truly two buildings: the Church House wing and entrance bay off Southampton Row and the Kingsgate Chapel off Catton Street.

Southampton Row is, as one would expect, characterised by the early 20th century buildings which were built following the construction of the new road. The buildings are of variable quality, but to the north are buildings of similar high quality and to the south on the corner of High Holborn, the former bank building (118-120 High Holborn) which is included in these proposals, makes an important townscape contribution to the conservation area. That building shares a stone finish, cornice lines and storey heights with the Church House block, and while in a neo Classical style of no great invention it does have a turret which ensures it is recognised as a corner building. It has two bays on Southampton Row elevation and three on High Holborn and a corner bay too. **[Plate 3.1]**

Southampton Row and Kingsway to the south are broad streets which allow some views of the Church House wing, but these are generally rather restricted and confused by the complexity of roof lines. The street itself is extremely busy and the tramway tunnel emerging to the north of the building, while an interesting feature, and the generally narrow pavements mean it is not the most convivial environment for pedestrians. However, the presence of street trees – so redolent of its early 20th century origins – do give it some sense of the Parisian boulevard.



3.1 118-120 High Holborn

3.2 Detracting light fitting and external shutters



3.2 Baptist Church House Externally

3.2.1 Southampton Row Elevation

The street facing facades to the former Baptist Church House are an exercise in the Edwardian Free Baroque style. All street elevations are faced in Portland stone, the building has four storeys to the main cornice and three bays of construction symmetrically arranged about its ground floor principal entrance and an eccentric gabled bay to the south. To the north, the stonework elevation turns into Catton Street with three bays of fenestration and another gable.

The principal entrance is marked by a neo Classical door case with fluted Tuscan pilasters and dentilled pediment with enrichments and pulvinated frieze with the legend 'The Baptist Church House'. Within this case is an arched granite opening with moulded impost and relief panels 'BU' and '1903'. Above the ground floor, the principal floor has tripartite windows with chased pilasters generally, but above the main doors an arched niche enclosing a window case with Ionic columns. The other window cases have more Arts & Crafts derived details to their arcaded heads. The corner is canted and at first floor level is a pedimented cased niche which includes a statue of John Bunyan. The joinery is predominately modern, dating from the conversion to the hotel but is in an appropriate period style.

3.3 118-120 High Holborn

This Portland stone-clad building is less inventive in its architectural treatment than the neighbouring former Baptist Church House. Nevertheless, its scale and massing, its confident Edwardian handling of neo-classical iconography and the superb craftsmanship displayed in the ornamental stone detail ensures that the building has an important townscape role. **[Plate 3.1]** The loss of its richly-detailed hardwood external doors, together with unfortunate crude uplighters mounted to the facade however, means that a once fine building has a shabby, neglected air. **[Plate 3.2]**

3.4 Former Baptist Church House Internally

Only the ground floor street facing rooms and the key public spaces at first floor and second floor of the main listed building were inspected in detail.

3.4.2 Ground Floor

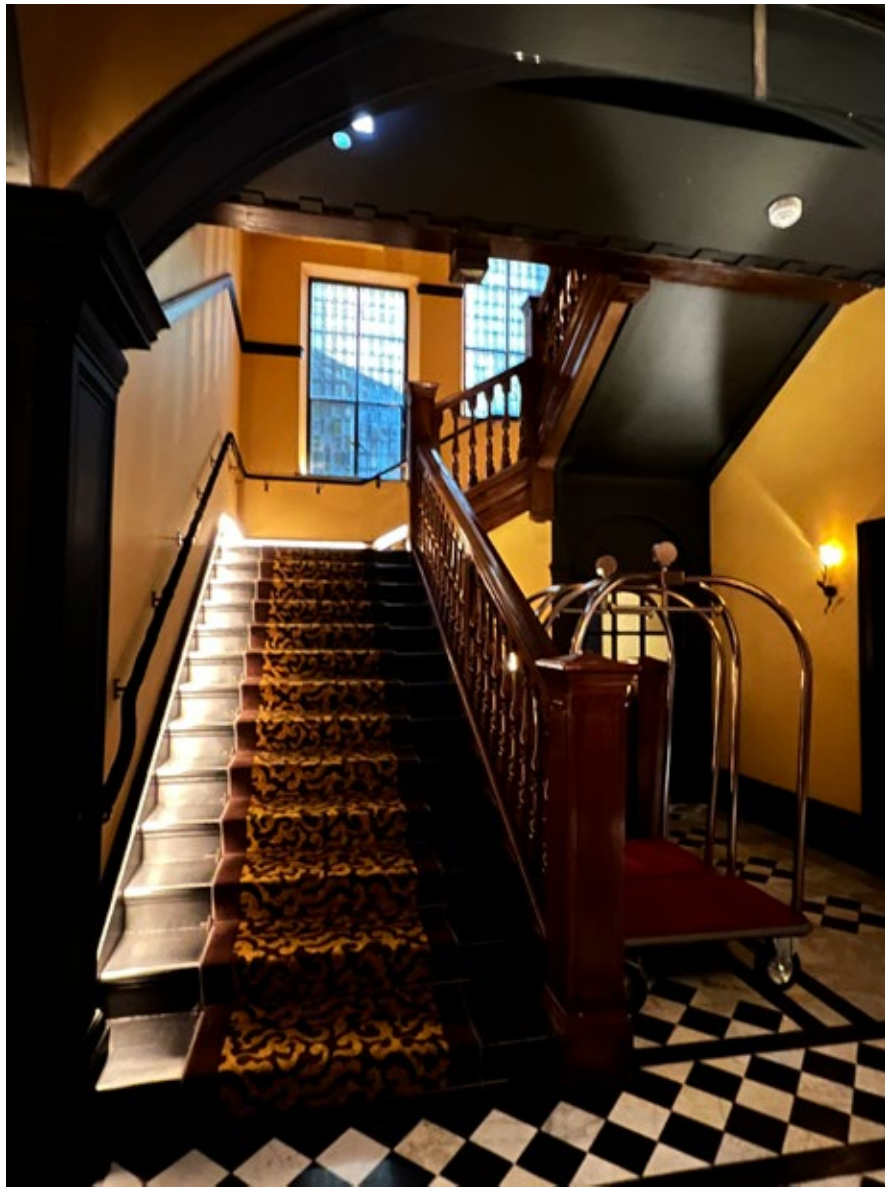
The street facing part of the building had been very heavily altered by 2007. The conversion to a hotel removed extraneous fabric and reinstated the sense of the original plan form. The original shop and publishing house to the right of the entrance from Southampton Row were successfully amalgamated to form the hotel's main, split level reception area. The vaulted entrance hall ceiling and stone flooring have clearly been carefully restored; most of the dark stained timber joinery is new, albeit of an appropriate period style **[Plate 3.3]**. The bookcases lining the party wall and the adjacent decorative panels are all modern but sympathetic to the remaining original joinery found elsewhere in the building. The chimney piece appears to be of Edwardian origins but refurbished and refinished to match the colour of the modern joinery **[Plate 3.4]**.

3.4.3 First Floor

The Shakespeare Room (the former council chamber) was named after a former president of the Union and is now a meeting room decorated with a (modern) peacock theme. The Edwardian hardwood panelling to the walls has been carefully restored as has the marble chimney piece. Above the fireplace is a terracotta relief entitled 'Freedom from Slavery'. It depicts two western men, one with a hat, one removing manacles from an enslaved African with other Afro-Caribbeans looking on. The background includes a palmetto tree and sugarcane **[Plate 3.5]**.

Inaccurately described in the 1994 upgraded listing as 'Baptist missionaries liberating aboriginals' the relief appears to commemorate the Baptist Church's important campaigning role in the West Indies and in Britain in the years leading up to the Slavery Abolition Act 1833. Clearly referencing the design of Josiah Wedgwood's anti-slavery medallions of more than a century before (which featured a kneeling African in chains with the slogan 'Am I not a man and a brother?') the enslaved Africans are depicted as passive recipients of Western charity.

The other terracotta sculptural relief 'Freedom from Sin' in the former visitor's room is now a bedroom suite. **[Plate 3.6]** It features a kneeling bearded western man in the company of three angels. In the background is the crucified Christ, his cross attended by a lone guard. The tableau depicts a scene from John Bunyan's *The Pilgrim's Progress* a highly influential Christian allegory originally written in 1678. In this scene the protagonist a man named Christian is finally relieved of the burden of his sin at 'the place of deliverance' – the cross of Calvary. After Christian is relieved, he is greeted by three angels, who give him greetings of peace, new clothes and a scroll as a passport to the 'Celestial City'.



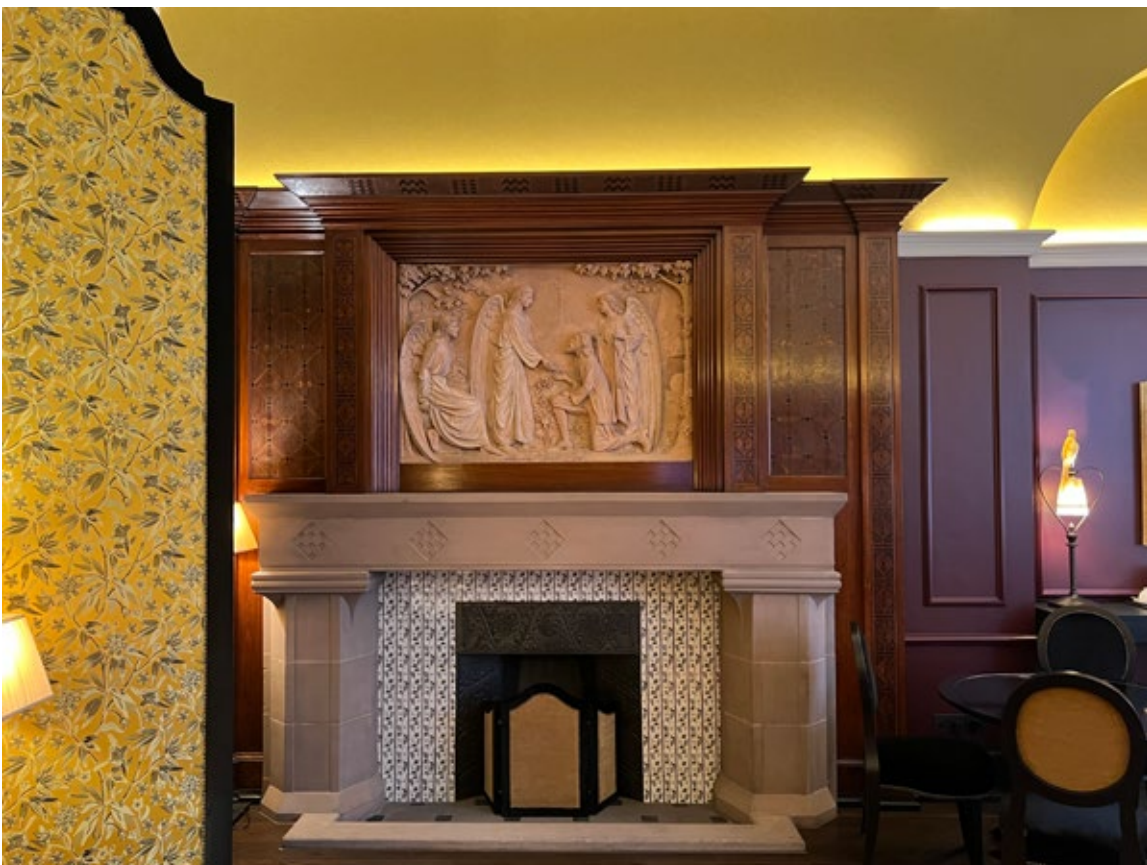
3.3 Repaired ground floor Stair and hallway

3.4 Reception (former bookshop) showing modern bookcases lining party wall with 118-120





3.5 Terracotta 'Freedom From Slavery' in former committee room



3.6 Terracotta 'Freedom From Sin' in former visitor's room

4.0 Assessment of Significance

4.1 Introduction

The purpose of this section is to provide an assessment of significance of the former Baptist Church House and the neighbouring unlisted building at 118-120 so that the effect of the proposals on that significance can be evaluated.

4.2 Assessment of Significance

Baptist Church House was built between 1901-1903 as the London centre for the international Baptist Church and its global missionary base during the height of the British Empire. The first building to be constructed on the newly-improved Southampton Row slum clearance scheme, the Baptist complex combined an octagonal chapel (with separate public entrance off Catton Street) and an L-shaped administration block incorporating meeting and conference rooms bookshop, offices and residential accommodation.

The complex was designed by Arthur Keen, a pupil of the celebrated architect Richard Norman Shaw, arguably one of the most influential of the late 19th century British architects. Keen's eclectic design used an idiosyncratic mixture of neo-Classical elements combined with Arts & Crafts detail and was an exemplar of the diversity and inventiveness of early 20th century British architecture. Following the Arts & Crafts philosophy of celebrating manual skills, the architect persuaded the client to engage high quality craftsmen including the plasterers Lawrence Turner and Richard Garbe and sculptor George Tinworth.

Tinworth, indeed, was commissioned to create a terracotta relief for the richly-panelled first floor committee room to commemorate the important part played by the Baptist Church in the movement for abolition of plantation slavery in Jamaica and elsewhere. The sculptures highlight the roles of the English missionary, teacher and pastor, William Knibb a passionate campaigner whose work directly led to the passing of the 1833 Act to abolish slavery in the British Empire. Whilst the relief is in itself of artistic merit, as is the relief in the former visitor's room, its historical significance is also high.

The self-confident missionary zeal and grandeur of Baptist Church House did not last however. Following WW1 declining congregations saw the Chapel sub-divided. The building also suffered bomb damage in World War II, which saw roofs destroyed; subsequent reparation was of a pragmatic and inelegant nature.

By the end of the 20th century, moreover, it appears that the Edwardian city-centre opulence of Baptist Church House was seen as an increasingly inappropriate physical manifestation of Baptist ministry. In 1989 the Baptist Union sold the Southampton Row complex to London Underground and moved its headquarters to a new, purpose-designed, but architecturally undistinguished, building on a suburban site near Didcot.

Plans by LUL to demolish the building to create a new Crossrail station were not carried through however. The former Baptist Church House was used as a hostel for the homeless and placed on the 'Heritage at Risk' register. In 2007 it was eventually sold, converted into a boutique hotel, and thereby given a new lease of life.

In summary, the former Baptist Church House is of high significance not only for its flamboyant Edwardian architecture and sculptural programme but as an historical symbol of the Baptist Church's contribution to improving the lives of the poor and dispossessed both in the former imperial capital and the colonies.

In terms of built fabric of the **highest significance** are:

- The flamboyantly-composed street facing facades including the statue of John Bunyan, author of the seminal moral text *Pilgrim's Progress*.
- The carefully restored former meeting rooms at first and second floor level including the sculptural 1902 reliefs by George Tinworth, commemorating the Baptist's contribution to the passing of the Slavery Abolition Act 1833.

Of **high significance** is

- Remaining original decorative joinery and plasterwork and other finishes.
- The remaining historic plan form, including the octagonal chapel.
- Of **neutral significance**, neither contributing to or detracting from the significance of the whole are:
- Modern joinery and finishes, although of an appropriate period style.

Factors which detract from the building's significance are:

- The hotel has a strong theme focussing on the personality of British 19th century writer, Oscar Wilde. Whilst this branding does work with the idiosyncratic and flamboyant architectural style of the buildings' interiors, it is somewhat at the expense of telling the important story of the building's history and the wider 'sense of place.' It would be worth considering bringing this history more to the fore. The decorative reliefs in the former committee room and visitor's room illustrating the Baptist Church's important campaigning role in helping end plantation slavery in the British Empire might be of particular interest and perhaps wider public access or on-line engagement might be encouraged.

118-120 High Holborn The principal significance of this unlisted commercial building is its contribution to the area's townscape as it forms the north eastern corner of a major cross-roads at the junction of High Holborn and Southampton Row. The building has, however, seen some modern interventions which detract from its ability to make a positive contribution to the character and appearance of the conservation area.

Factors which detract include:

- Loss of the original richly panelled hardwood corner entrance door and its replacement by an undistinguished modern frameless glazed door.
- Unfortunate security roller shutter to secondary door on Southampton Row.
- Clumsy and obtrusive external light fittings.
- Inconsidered location of alarm, bird-deterrents and other surface-mounted paraphernalia.

5.0 Commentary on the Proposals

5.1 Description of the Proposals

The proposals are minor in nature and involve small amendments to the previously-consented 2023 scheme. As noted above the works to the former Baptist Church House are internal only and have no effect on the exterior of the building. Also included within this application, however, are works to improve the exterior of the unlisted neighbouring building at 118-120 High Holborn. A brief description of the current proposals follows with an assessment of the effects of the proposals on significance of the designated assets in question in italics below.

L'Oscar (Former Baptist Church House)

The works would comprise the change of use of the ground and basement level from bank use to form part of the hotel. The creation of a 'secret' timber jib book-case/ door to permit internal access at ground floor between the street facing former bookshop of the former Baptist Church House, now the reception area of the boutique hotel, and the adjacent former bank building at 118-120.

Effect on Significance

The previously-consented scheme included an opening in the party wall between the two buildings at ground floor level. However, this location would result in guests entering a 'back of house' space in order to access bedrooms and the adjacent ground floor; other options have been considered to create improved circulation but adjusting the location of the permitted opening, creates the simplest and most coherent link.

As noted previously, this reception area was originally the bookshop for Baptist Church House; however, early in the building's life the bookshop was comprehensively altered for an independent book retailer. The current bookcase joinery is all modern. There is, moreover, a long history of the creation of openings in the party wall between the former Baptist Church House and its neighbour. As shown in the photo of the former visitor's room in 1982, however, not all of the doors between the two buildings have been as inventive and imaginative as this solution.

It is considered that the creation of a jib 'bookcase/door' is a creative and appropriate response to the desire, once again, to link the two buildings. When shut, the door would be not visible, as it would be 'read' as part of the modern bookcases that line the party wall; when open it would allude to the history of the two buildings' physical links as well as to the original presence of a bookshop within Baptist Church House. It is considered, therefore, that this would cause no harm to the listed building's architectural historical or significance.

High Holborn

The external proposals include the reinstatement of the missing hardwood external ground floor doors to the former bank in an appropriate period style. The proposals also include the removal of the ugly large uplighters to the external façade; their replacement with more discreet feature lighting to echo the lighting on the former Baptist Church House will be the subject of a future application.

Effect on Significance

These works would improve the external appearance of the 118-120 High Holborn, a building that plays an important townscape role within the conservation area. As such the works would provide a modest enhancement of the character and appearance of the conservation area as well as the wider setting of adjacent listed buildings.

5.2 Justification of the Proposals

The previous award of planning permission and listed building consent (2022/1915/L Approved 1 February 2023) contained the following observations regarding the design and location of the ground floor opening between the two buildings:

‘The proposals involve the formation of openings in the structural wall between 118-120 High Holborn and 2-6 Southampton Row at basement and ground floor level. These would be in a basement corridor and at the rear of the ground floor hotel lounge in 2-6 Southampton Row. The works are proposed in association with the change of use of the basement, ground floor and mezzanine of 118 - 120 High Holborn to a hotel use in association with the existing hotel at 2-6 Southampton Row (associated planning application submitted under reference 2022/1386/P). 118-120 High Holborn is not listed, but 2-6 Southampton Row is Grade II* listed.

The proposed ground floor opening was previously consented as part of approved scheme 2007/5206/L which has been partially implemented. Although the approved openings have not been carried out to date they remain extant because the rest of the proposals have been implemented, and as such, the previous permission forms a strong material consideration. The opening at basement level is within a part of the building with lesser significance and sensitivity and is considered acceptable.

It was initially proposed to form an opening at the front of the ground floor lounge in 2-6 Southampton Row. This was removed from the proposals at the request of the Council's Conservation Officer due to the impact the lateral opening would have had on the plan form of a principal room of the building and also the main envelope of the listed building. This would have caused harm to the significance of the building due to the impact on the main envelope of the building, confusing the understanding of the original architecture, circulation and plan form.’

As explained above, it is Insall's opinion that a, carefully-designed, jib door/bookcase would not confuse the understanding of the original architecture, circulation and plan form. It is, however, necessary to test this opinion against current heritage planning policy local and national. The 1990 Act and Camden heritage policies are addressed first followed by the policies of the NPPF. A summary of each of the policies is first followed by a commentary in italics.

Planning (Listed Buildings and Conservation Areas) Act 1990.

The Act forms the legal basis for decision making where a proposed development will impact listed buildings or a conservation area. For listed buildings it sets out that the decision maker shall have 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' (s. 16 and 66), and for conservation areas, that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that [conservation] area' (s. 72).

It is considered that the creation of the jib door/bookcase and associated works in the revised location would involve the minimal loss of historic fabric and plan form and preserve the special architectural and historic interest of the listed building, in accordance with the statutory duties set out in the Act.

The proposed reinstatement of the hardwood doors of 118-120 High Holborn and the removal of ungainly external light fittings would modestly enhance the character and appearance of the conservation area, and setting of neighbouring heritage assets.

Camden Local Heritage Policy

As explained in Section 1.2, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the Site comprises the Camden Local development Framework 2010-- 2025. Including retained heritage policies **DP25 – Conserving Camden's heritage**. The most relevant policy here is 'f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building;'

Again, it is considered that the ground floor jib door/ book-case would cause no harm to the 'special interest' of the building.

National Planning Policy Framework

As explained above, it is Insall's opinion that proposals would result in 'no harm' to the significance of the heritage assets.

However, it is clear that Camden perceives some harm, so this needs to be explored in more detail. Given that the proposals for creating a new jib door/book case, are small in terms of the scale of intervention to the plan form, and minor in terms of loss of original fabric, it would be reasonable to conclude that the scale of this potential harm would be very much 'less than substantial' in accordance with the terminology of the NPPF.

Paragraph 202 of the NPPF states that any 'less than substantial harm' to the significance of a designated heritage asset should be weighed against the public benefits of the proposal. It is considered, therefore, that any perceived 'less than substantial' harm to the listed building resulting from the proposals would be outweighed by the following heritage and public benefits:

- Replacing the missing hardwood external doors to 118-120 High Holborn,
- Removing the ugly light fittings and improving the untidy street façade of 118-120.
- And, most importantly, bringing the currently unoccupied former bank branch at 118-120 into viable use, thereby also helping to ensuring that the Grade II* listed former Baptist Church House is still used and maintained.

5.3 Conclusion

As outlined in Section 2.0 there have been internal lateral links between Baptist Church House and its neighbour at 118 -120 High Holborn from before the former's inclusion on the national list of buildings of special interest. Moreover, the 2007 consented scheme contained proposals for links through the party wall in different locations. These links were not carried out at the time and 118-120 remained in separate commercial use. Nevertheless the principle of lateral links between the two buildings is historically well established.

- The renewed proposals would involve the minimal loss of historic fabric and changes to the historic plan form. The creation of a jib door/ book-case, moreover, follows the Arts & Crafts ideals of the original, idiosyncratic Edwardian 'free Baroque' design, and celebrates the skill and craftsmanship involved in the high quality bespoke joinery found elsewhere in the building. Rather than confusing the understanding of the original architecture, circulation and plan form the creation of a 'secret' book case opening through the party wall could encourage engagement with the building and its history.

As noted above in Insall's view the proposals would cause not harm to the heritage significance of the Grade II* listed building. If any harm is perceived, however, it certainly is at the very lowest end of 'less than substantial' in terms of the NPPF para 202 and would be easily outweighed by the compelling benefits offered by the amended proposals.

Appendix I - Statutory List Description

TQ3081NE SOUTHAMPTON ROW
798-1/101/1477 (East side)
15/02/82 Nos.2, 4 AND 6
Baptist Church House

GV II*

Includes: Kingsgate House CATTON STREET.
Office block and shops with former chapel; Kingsgate House, Catton Street forms the return and rear of this building. 1901-1903. By Arthur Keen, architect for the Baptist Union of Great Britain and Ireland. Restored in 1946 by RM Piggott. Exterior sculpture by Richard Garbe and internal plasterwork by Lawrence Turner. Portland stone ashlar with tiled roofs. STYLE: "Wrenaissance" style with Flemish inspired shaped gables, eclectic Baroque and Arts and Crafts details.

EXTERIOR: 4 storeys with attic gables and 4 stage attic tower. 5 bays to Southampton Row, 3-bay return and 6-bay wing to Catton Street. North west corner splayed. Ground floor has 3 wide segmental-arched shopfronts, at south the surviving original shop window. Off-centre centre doors and fanlight. First floor has segmental-arched tripartite windows, over entrance with attached Corinthian columns, at south end bay flanked with 2 additional openings. Second and third floors have alternate flush rusticated bays with recessed bays having giant Ionic columns through both storeys. Third floor with 4 arch headed windows with Ionic half columns and pediments; 4th floor with 4 straight headed windows; additional flanking openings to south end bay on both floors. First and second floor bands, rusticated angle quoins, and attic cornice. Sashes with glazing bars throughout. Attic pediment over entrance bay with attic tower above, Wrennian inspiration angle pilasters, urns, dentil cornice, octagonal bell stage with arched louvred openings. Concave octagonal arched windows with lunettes over, shaped verges and apex aedicules. Much metalwork decoration to balconies and sills. Splayed north-west angle has foundation tablet dated 1901 and, above, a statue of John Bunyan by Richard Garbe, sculptor. Return to Catton Street has 3 stone ashlar and 6 red brick and stone dressed bays. Arched ground floor openings. Gabled 1st floor and arch-headed second floor sashes with glazing bars. Attached at north-east, former Kingsgate Chapel. 2 storeys with attic; polygonal on plan. Tripartite lunettes, angle pilasters, polygonal tiled cupola with clerestory and conical roof. 2 storey advanced porch. 3 stage tower with angle quoins, gabled windows, swept lead roof with cupola.

INTERIORS: Baptist Church House retains tiled and vaulted ground and first floor corridors. The statue of Charles Haddon Spurgeon by Derwent Wood which formerly stood on an inscribed plinth under a niche in the entrance hall is now missing; the entrance hall is pilastered and has a barrel vault, a ceiling treatment which recurs throughout the ground and first floors. Dog-leg stone tread stair in C17 manner with fat balusters and handrail in wood to first floor; metal-work balustrade to stair on upper floors. Four interiors of very good quality inspected in September 1994: The original 2-storey Kingsgate Chapel to the rear of the site was divided at gallery level in 1939. It is octagonal in plan with a dome finishing in a columned light monitor. Fine plaster ornament augmented by low relief panels depicting varieties of British trees in an Arts and Crafts manner by Lawrence Turner; the inside has recently been sealed to the weather and fumigated. After it was divided in two the top half of the Chapel became the Union's Council Chamber. In 1939 the former Council Chamber became the 'Shakespeare Room', named after the Union Secretary at the time the complex was built. This is a barrel-vaulted room of 3 bays on the first floor (now No.108) with splendid Arts and Crafts plaster work by Lawrence Turner; the chimney piece is made from polished alabaster and features a low relief terracotta plaque depicting Baptist missionaries liberating aboriginals; this is signed Doulton of Lambeth and is said to be by George Tinworth; wood panelling to lower walls; tympanum of barrel vault opposite entrance bears low relief portrait bust of Robert Hall in stone; Diocletian windows with original leaded glazing. The former Committee Room is also on the first floor (now No.107, it is found in the north-west corner): this is entered via a short barrel-vaulted corridor which is top glazed; in the side wall of this corridor is a plaque erected at the time the building was completed recording those associated with the project; ceiling divided into nine compartments, the principal divisions ornamented by rich plasterwork; a second terracotta low relief plaque, also said to be the work of Tinworth is set above the fireplace. Finally, there is the former Library on the second floor, now room No.208, with wood panelling and an exceptionally fine chimney surround with inlaid wood and roundels in an Arts and Crafts manner; the original book cases fixed to the walls survive; ceiling divided into 12 compartments, across 4 bays; 4 segmental-arched clerestory windows to east wall above library cases and two to the west wall; all windows with lead glazing of an original design. The General Secretary's room, said to have a plaster cornice with central pendant could not be located, nor could the Visitors' Room with panelled ceiling and cornice, although the rooms have been renamed and may be those inspected. Many original doors survive, and several features from the 1939 refurbishment, including stair rails and floors.

HISTORICAL NOTE: The British Council of Churches was inaugurated here in 1942.

Listing NGR: TQ3054681574

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72(l) of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

[...] in considering whether to grant listed building consent for any works the local planning authority or 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.

Similarly, section 66 of the above Act states that:

In considering whether to grant 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.

Similarly, section 72(l) of the above Act states that:

[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Local Policy

LONDON BOROUGH OF CAMDEN

Camden's Local Development Framework was adopted in 2010.

LONDON BOROUGH OF CAMDEN DEVELOPMENT POLICIES (2010)

DP24 – Securing high quality design

The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;

- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.

DP25 – Conserving Camden’s heritage

Conservation Areas

In order to maintain the character of Camden’s conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden’s architectural heritage.

Listed Buildings

To preserve or enhance the borough’s listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- g) not permit development that it considers would cause harm to the setting of a listed building.

Regional Policy

The London Plan (March 2021)

In March 2021 the Mayor adopted The London Plan. This is operative as the Mayor’s spatial development strategy and forms part of the development plan for Greater London. Policies pertaining to heritage include the following:

Policy HC1 Heritage Conservation and Growth

(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;...

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 199 the framework states the following:

...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 200 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, paragraph 202 of the NPPF states the following;

202. 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 terms of non-designated heritage assets, the NPPF states:

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Framework requires local planning authorities to 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. Paragraph 206 states that:

... 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.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment: relevant extracts are included below.

Paragraph 6: What is “significance”?

‘Significance’ in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- **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 skill, 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.

In legislation and designation criteria, the terms ‘special architectural or historic interest’ of a listed building and the ‘national importance’ of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset’s significance.

Paragraph 7: Why is ‘significance’ important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 199-203) apply.

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

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 200).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public

benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

