

Heritage Statement

50a Earlham Street, Seven Dials Warehouse WC2H 9LA

On behalf of Humble Crumble Ltd

May 2023

Project Ref. 00473

V.1





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Introduction

- This Heritage Statement has been prepared on behalf of Humble Crumble Ltd and accompanies an application for Listed Building Consent and Planning Permission at Humble Crumble, 50a Earlham Street. The Statement informs Camden Council, decision makers, of the history, development and significance of the site and its environs, namely the heritage assets potentially affected by the proposals.
- 50a Earlham Street forms a small part of the large Grade II listed Seven Dials Warehouse at Nos.27-33 Shelton Street and 42-54 Farlham Street. The site is also located within the Seven Dials Conservation Area and is adjacent to a number of neighbouring listed buildings (see Figure 2, next page).
- 3. 50a is situated on the southern side of Earlham Street, not far from its junction with Neal Street. It forms a small part of the much larger Seven Dials Warehouse, which was originally constructed in the mid-19th century as a brewery building, and has since been converted for use by numerous retail, F&B and office occupiers.
- 4. The proposed changes covered in this heritage statement and requiring listed building consent are limited to minor changes to the ground floor frontage a small number of internal alterations.
- Within this statement a summary of significance is presented together with the effects of the proposed changes on that significance. The proposed changes will be considered against relevant planning policy and legislation and it will be demonstrated that the changes accord with core principles by sustaining the significance of the affected heritage

Application Site

50a Earlham Street

- 50a Earlham Street forms part of the much larger Seven Dials Warehouse, built in the mid-19th century and converted to mixed-use in 1979, before further major refurbishments in 2001 and 2017.
- 7. The application site itself is limited to a small section of the building's wider ground floor-a narrow section of ground floor shopfront with entrance door and display window, two windows at upper levels and a modest internal space with mezzanine floor.



Figure 1: Exterior view of 50a Earlham Street, part of the larger Seven Dials Warehouse.

List Description

The Seven Dials Warehouse was listed at Grade II on 25th July 2002 (List Entry Number 1061403). Its list description reads as follows:

> Former Brewery Building. 27-33 Shelton Street and 42-54 Earlham Street. Mid-19th century, designer unknown. Yellow stock brick with granite dressings; roof not visible. Occupying a narrow wedge-shaped site, narrowing to the east, this former brewery building comprises a five-storey structure with a granite plinth, a granite impost band, a brick cornice and parapet.

> EXTERIOR: the narrow three-window wide east front has a large central opening with a pedimented door surround, retaining a gas lamp bracket to the centre. The longer side elevations have a mixture of window openings, generally with sash windows, some of which have been enlarged in recent times, but which retain their brick arches. The south elevation retains a loading bay with a crane hoist. Large granite-lined door surrounds are found on each side elevation too, as well as smaller openings.

INTERIOR: inspected in part; the basement, currently the Belgo Restaurant, retains its cast iron



columns, jack-arched roof and barrel-vaulted cellars to the east, with a stone-paved floor. Other cast iron columns remain in situ within the retail space at upper levels.

HISTORY: this block formed part of the former Combe's Brewery, the origins of which go back to the early 18th century. It expanded in the mid-19th century, becoming the 4th largest London brewery by the 1880s; it amalgamated with Watney's in 1898, and was vacated by them in 1905. According to the 1888 Goad Insurance Plan, this building was the cooling and fermenting section of the brewery, and was linked at its upper levels with bridges connecting this block with its neighbours to the north and south. Discussions for constructing such bridges

Figure 2: Area plan of the Seven Dials Warehouse, edged in red, and its surroundings. Nearby designated heritage assets denoted by a blue tone. © Camden Council

were commenced in 1861, which is a probable terminus ante quem for the building's construction. The building had various post-1905 uses: the largest of which was as a stationers' warehouse. Despite considerable lesser alterations, the building retains its pronounced industrial character, and as such is an unusual survival in inner central London. It also possesses strong group value with already listed brewery buildings to the south, over the boundary in the City of Westminster.

Historic Development Summary

Seven Dials was designed by Thomas Neale in the late-17th century—it initially consisted of six roads converging onto a central crossroads, which was

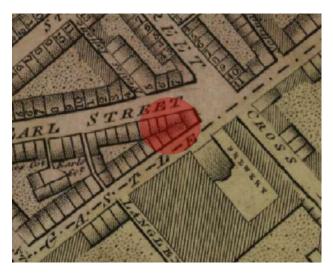


Figure 3: Horwood's Map of 1799, site location circled in red.



Figure 4: Goad Plan of 1887, Seven Dials Warehouse site location delineated in red.



later increased to seven. To the south of the site, a small brewery was established by John Shackley in 1722, which was later enlarged by William Gyfford. By the late-18th century the brewery was the fifth largest porter brewery in London, but it had not yet expanded into the Seven Dials Warehouse site.

- The site of the current Seven Dials Warehouse was 10 initially developed as a brewery premises in around 1810 when the neighbouring brewery business expanded onto the site, and Horwood's Map of 1799 (Figure 3) shows the area just prior to this occurring. The brewery continued to expand into the early 19th century and these early brewery buildings were later rebuilt and enlarged in around 1861, most likely to accommodate new machinery used in the brewing process which was of very considerable size. The first known depiction of the current warehouse dates to 1888. This engraving shows the corner elevation of the building fronting Neal Street, although the Earlham Street elevation cannot be seen.
- 11. Watney, Combe, Reid and Co closed the brewery in 1905 and began a process of selling and subletting different buildings on the wider site. The Seven Dials Warehouse was one of the first of the buildings to be sold, and was divided into two separate units. Various alterations took place to allow the building to be used by new occupants, and new windows were inserted in various locations.
- 12. The entire building was eventually purchased by the Greater London council in 1972 and they initially sought to demolish it. This plan was thankfully never realised and in 1979 the building was converted for mixed use purposes to include shops, restaurants, a gallery and office & community space. The layout of the building was of course substantially altered at this

- time and many new partitions and services were inserted, along with new doorways and windows. At this time, the Humble Crumble unit appears to have been serving as a WC area.
- In September 1999 a serious fire broke out which destroyed everything from third floor upwards. A large-scale refurbishment followed in 2001, and another in 2017. The date at which Humble Crumble's unit, 50a Earlham Street, was first partitioned off to be used independently is not known, but clearly post-dates the 1970s when it appeared to be in use as a WC block. In 1997 permission was granted to convert what was then an A3 (café/restaurant) space to retail use and carry out numerous internal and external alterations, but some of these works appear not to have been carried out. A further application was granted consent in 2005, and the existing external arrangement of a glazed screen over the disused lift shaft was inserted shortly after this.
- 14. A brief overview of 50a's planning history is laid out below:

1997—PS9704151R2 - Alterations including new entrance door and frame, a non-illuminated toughened glass panel to the right of the door, a new window frame (5) to match the door, in connection with the change of use from Class A3 restaurant use to Class A1 retail use. (CONSENTED)

2004/4995/P—The application of a glazed screen across a recessed entrance to a disused lift. (CONSENTED)

2005/4997/L—Works associated with the application of a glazed screen across a recessed entrance to a disused lift. (CONSENTED)

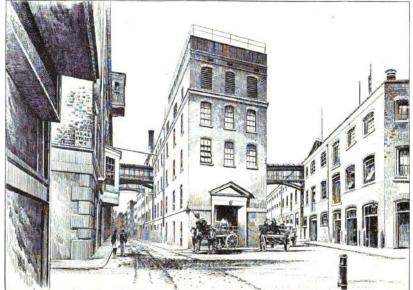


Figure 5: Engraving of the Seven Dials Warehouse in 1888, taken from Alfred Barnard's 'The Noted Breweries of Great Britain and Ireland, Volume 1' (1889).

Photos



Figure 6: Exterior view



Figure 7: Ground floor exterior view



Figure 8: Shop front hatch area, in front of the disused lift shaft



Figure 9: Interior view, towards entrance door



Photos



Figure 10: Ground floor Interior



Figure 11: View up to high level window



Figure 12: View from ground floor up to mezzanine and high level windows



Figure 13: View from ground floor up to mezzanine and high level windows, entrance door to left

Assessment of Significance

Architectural Interest

- Exterior: The primary interest of the Seven Dials Warehouse as a whole stems from the scale, character and appearance of its elevations, which reflect its past use as a brewery building. Humble Crumble's very small unit, 50a, is not of significance in isolation as it represents a later intervention. Its ground floor openings appear to have been inserted in the mid-to-later 20th century and its windows are modern. The ground and first floor windows are not in keeping with the established glazing style seen elsewhere throughout the façade of the warehouse.
- 14 The Seven Dials Warehouse as a whole forms an important element of the streetscape and makes a positive contribution to the character and appearance of the Seven Dials Conservation Area. but its interests are not enhanced by the outward appearance of 50a.
- 15. Interior: The interior of 50a is entirely modern, and was converted in the late 20th century from a 1970s WC area. Its fabric and plan form are modern and of no significance.

Historic Interest

The Seven Dials Warehouse derives significance from its historic interest. The building is representative of the development and evolution of the Seven Dials Area, and is of significance for its association with London's brewing industry.

Seven Dials Conservation Area

The Seven Dials Conservation Area Statement was adopted in 1998. An extract from this document summarises the key features of the area:

> Most buildings appear to spring from the footway without physical front boundaries or basement areas. In this tightly contained streetscape, changes of road width, building form and land-use give dramatic character variation, narrow alleys and hidden yards provide unforeseen interest and the few open spaces provide relief and a chance to pause and take stock of one's surroundings. Apart from Seven Dials there are no formal open spaces but some significant informal spaces occur in the form of yards and street junctions.

16. The Seven Dials Warehouse as a whole contributes to the character and appearance of the Seven Dials Conservation Area. The ground floor shop front of 50a, as stated previously, is however of little heritage interest and is neutral in its contribution to the interest of the streetscape or wider area.

Impact Assessment

Proposal

- 23. The proposed scheme of works include the following:
 - The replacement of the existing modern glass entrance door;
 - The creation of a new external ordering point in place of the existing modern glazing over the disused lift shaft;
 - The internal fit-out of the unit at ground floor and mezzanine level;
 - The installation of new services:
 - New signage and decorations to the exterior.

Impact on the Listed Building

- The replacement of the existing modern glass entrance door: The existing glazed door is entirely modern and was installed in the late 20th century. It is of low quality and is not in keeping with the character and appearance of the building and surrounding heritage assets. It is proposed to replace this door with glazed timber double doors of a style seen more commonly elsewhere in the area, for example on the similarly scaled Seven Dials Market building directly opposite, which is also Grade II listed and also formed part of the historic brewery complex.
- 25. These proposed double doors will sit more comfortably in their setting and will enhance the character and appearance of the wider building and its contribution to the Seven Dials Conservation Area.
- 26. The creation of a new external ordering point in place of the existing modern glazing over the disused lift shaft: The existing ground floor glazing was installed over the top of the disused lift shaft in c.2010, in order for the shallow space to be used as a shop display area. This glazed shop window does not contribute to the character and appearance of the



- wider building and is of no significance. It is proposed to replace it with a set of timber double doors of a style seen on the similarly scaled Grade II listed Seven Dials Market building opposite. These timber double doors, which will operate as an access hatch concealing an ipad ordering area, have been designed to be reminiscent of industrial timber doors seen on warehouse buildings throughout the Seven Dials Area—for example those at first floor level above the Seven Dials Market entrance opposite.
- 27. The removal of the unsympathetic glazed window and its replacement with timber doors will enhance the character and appearance of the building and its contribution to the Seven Dials Conservation Area.
- 28. The internal fit-out of the unit at ground floor and mezzanine level: The existing internal fit out of the unit is entirely modern and dates to the post-2000 period. The proposed scheme will install a new partition to enclose the modern staircase up to the mezzanine level, which will conceal the new services (discussed below). This partition will meet the central mullion of the modern (but traditionally styled) high level window within the ceiling void area. Due to the very high positioning of this window and the narrowness of the internal space, this will be very difficult to see internally, and will be concealed externally through the masking of one of the window panes with a solid film. Examples of this can be seen on numerous other windows on the building's Earlham Street façade.
- 29. New demountable counters will also be installed, and the modern glass mezzanine balustrade will be replaced by a compliant laminated glass balustrade. The existing walls, all of which are in a very poor condition, will be made good and finished with plasterboard dot and dabbed to their existing surface, as previously used. New floor finishes on top of the existing modern concrete screed will also be installed, and a mural painted on the high level wall above the mezzanine.
- 30. There will be no adverse impacts as a result of these works. The only historic fabric within the interior are small sections of exterior wall which are in very poor condition. These small sections of wall have been

- underneath plasterboard for many years, and this existing plasterboard will simply be replaced using the same methods.
- 31. The character and appearance of the existing interior in no way enhances the character of the wider building, and these works will substantially improve its overall character, condition and quality. The space and its plan form are an entirely modern invention, and none of these proposed changes impact upon any established historic form.
- 32. These proposals will have a beneficial impact upon the character and appearance of the space, primarily as a result of an enhancement in its overall quality and condition.
- 33. The installation of new services: The proposed mechanical extract will be discreetly positioned within the proposed internal partition and like all other proposed service upgrades, will re-use existing penetrations in the fabric. The only external expression of these services will come in the replacement of an existing extract fan in one of the upper level window panes with a small louvre, echoing those seen in the adjacent window of another unit.
- 34. None of these works will result in any impacts to historic fabric, and the addition of a high level extract louvre in one pane of a modern window is entirely in keeping with an established window form seen in many locations throughout the building. These works will have a neutral impact on the character and appearance of the building, and on the setting of the Seven Dials Conservation Area.
- 35. New signage and decorations to the exterior: The proposed signage replaces the existing arrangement. A simple, modestly-proportioned and non-illuminated sign on the façade, directly above the entrance doors, will be made in the Humble Crumble font. The existing projecting sign will also be replaced with a powder coated black metal version echoing the size and style of those on adjacent buildings and units. This will also be non-illuminated. These changes will have no adverse impact on the fabric or the character and appearance of the building and conservation area, and will enhance its overall quality.

Impact on the Conservation Area

The proposals will result in a negligible beneficial change to the character and appearance of the Seven Dials Conservation Area, and its significance will be preserved. The proposed external changes respond to the character of surrounding buildings and frontages in the Seven Dials area, and in particular those associated with the historic brewery complex buildings.

Impact on Nearby Listed Buildings

28. The proposed changes to this small Seven Dials Warehouse unit will result in a negligible beneficial change within the setting of nearby listed buildings, namely those opposite on Earlham Street. Their setting and how it contributes to their significance will be preserved.

Policy Compliance & Conclusions

Policy Compliance

- 29. This statement has provided the decision-makers with a proportionate level of assessment of the assets affected, in accordance with paragraph 194 of the NPPF. It is demonstrated that the proposals will preserve the architectural and historical interest of the listed building.
- 30. In terms of the NPPF, no harm has been identified to the listed building, conservation area or nearby listed buildings and the proposals will therefore not engage paragraph 202. The proposed alterations to the shop unit are in keeping with the character and heritage interests of the wider listed building and conservation area and will preserve their significance.
- 31. The proposals accord with the policy set out within the London Plan (2021). There is no compromise of local character and the heritage assets affected are conserved. These minor alterations also allows continued and appropriate use of the building.
- 32. The proposals are considered to comply with Policy D2 of Camden's Local Plan and work in harmony with the key aspects of the character and appearance of the Seven Dials Warehouse. The design of the proposed changes have been carefully considered, so as to ensure that the proposals compliment the existing building. They have been

developed with the building's special interests and historic development in mind. The proposals would preserve the building's significance and no harms have been identified. As such, the scheme accords with Parts I, J and K of Policy D2 within Camden's Local Plan.

Conclusions

- 33. This heritage statement has undertaken an assessment of the significance of the application site, 50a Earlham Street, which forms a small part of the Grade II listed Seven Dials Warehouse. This has been followed by an appraisal of the effects of the proposals on the significance of the heritage assets the listed building of which 50a Earlham Street forms a part, and the Seven Dials Conservation Area, with consideration given to local and national policy and guidance.
- 34. In terms of the existing site, the modern additions and openings that make up the ground floor shop front are of no inherent heritage interest, and do not contribute to the overall significance of the listed building and conservation area. Instead the application site derives interest from the wider building of which it forms a small part. The proposals have sought minor changes, which taken together enhance the site's character, appearance and quality, and work to better reveal the special interests of the listed building and conservation area.
- 35. In terms of impact, the proposals affect modern fabric and bring about beneficial visual change to a small part of the asset where change is frequent and varied. The proposals would be easily removable and proportionately are in keeping with the design and development of other facades and shopfronts in the area. As a result, the proposals will preserve and enhance the significance of affected heritage assets.
- 36. The proposals have been assessed against the policy and guidance set out within the 1990 Act, the NPPF and Camden Council's Local Plan. This assessment concludes that the proposals accord with the policy and guidance and offer changes that will preserve and enhance the significance of the listed building and conservation area.



Appendix 1: Legislation & Planning Policy

Legislation

- The Planning (Listed Building and Conservation Areas) Act 1990 is the current legislation relating to listed buildings and conservation areas and is a primary consideration.
- 2) In respect of proposals potentially affected listed buildings, Section 66 states that "in considering whether to grant planning permission or permission in principle 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".
- 3) In respect of conservation areas, Section 72 of the Act places a duty on the decision maker to pay special attention to the desirability of preserving or enhancing the character or appearance of the area.

National Planning Policy Framework (revised 2021)

- 4) The Government's planning policies for England are set out within the National Planning Policy Framework (revised 2021). It sets out a framework within which locally prepared plans can be produced. It is a material consideration and relates to planning law, noting that applications are to be determined in accordance with the local plans unless material considerations indicate otherwise.
- 5) Chapter 16, 'Conserving and enhancing the historic environment', is of particular relevance.
- 6) Heritage assets are recognised as being a irreplaceable resource that should be conserved in a manner appropriate to their significance. (Paragraph 189) The conservation of heritage assets in a manner appropriate to their significance is also a core planning principle.
- 7) Conservation (for heritage policy) is defined at annex 2 as: "a process of maintaining and managing change in a way that sustains and, where appropriate, enhances its significance." It differs from preservation which is the maintenance of something in its current state.
- 8) Significance (for heritage policy) is defined at annex 2

- as: "The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting..."
- 9) As a framework for local plans the NPPF, at paragraph 190, directs that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, taking into account four key factors:
 - a. "The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - The desirability of new development making a positive contribution to local character and distinctiveness; and
 - d. Opportunities to draw on the contribution made by the historic environment to the character of a place."
- This approach is followed through in decision making with Local Planning Authorities having the responsibility to take account of 'a' as well as 'The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality' and 'the desirability of new development making a positive contribution to local character and distinctiveness'. (Paragraph 197)
- 11) Describing the significance of any heritage asset affected, including the contribution made by its setting, is the responsibility of an applicant. Any such assessment should be proportionate to the asset's significance. (Paragraph 194)
- 12) Identifying and assessing the particular significance of any heritage asset potentially affected by a proposal, taking into account evidence and expertise, is the responsibility of the Local Planning Authorities. The purpose of this is to 'avoid or



- minimize any conflict between the heritage asset's conservation and any aspect of the proposal'. (Paragraph 195)
- 13) In decision making where designated heritage assets are affected, Paragraph 199 places a duty of giving 'great weight' to the asset's conservation when considering the impact of a proposed development, irrespective of the level of harm.
- 14) Heritage Assets are defined in Annex 2 as: "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."
- 15) Harm to designated heritage assets is categorized into 'substantial harm', addressed in Paragraphs 200 and 201 of the NPPF, or 'less than substantial harm', addressed in Paragraphs 202.
- 16) The effects of any development on a heritage asset, whether designated or not, needs to be assessed against its archaeological, architectural, artistic and historic interests as the core elements of the asset's significance.
- 17) The setting of Heritage Assets is defined in Annex 2 of the NPPF as: "

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

National Planning Practice Guidance

- National Planning Practice Guidance relating to Chapter 16 of the NPPF was last modified on 23 July 2019.
- 20) In respect of levels of harm paragraph 018 recognises that substantial harm is a high test. Case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset. In cases where harm is found to be less than substantial, a local authority is to weigh that harm against the public benefits of the proposal.
- 21) Proposals can minimise or avoid harm to the

- significance of a heritage asset and its setting through first understanding significance to identify opportunities and constraints and then informing development proposals.
- 22) A listed building is a building that has been designated because of its special architectural or historic interest and includes the building, any object or structure fixed to the buildings, and any object or structure within the curtilage of the buildings which forms part of the land and has done so since before 1 July 1948. (Paragraph 023)
- 23) The term 'Special architectural or historic interest' as used in legislation are used to describe all parts of a heritage asset's significance.

67)Paragraph 007 of the NPPG states: "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."

25) Paragraph 013 states:

26)"The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each."

London Plan (2021)

26) The London Plan (2021) provides a city wide framework within which individual boroughs must set their local planning policies. It is not a revision but offers a new approach from previous iterations of the London Plan. While policies are generally strategic and of limited relevance the policies relating to the historic environment are detailed within Chapter 7 Heritage and Culture. These have been aligned with the policies set out in the NPPF, key of which is



Policy HC1: Heritage Conservation and Growth. This policy provides an overview of a London wide approach to heritage and in doing so requires local authorities to demonstrate a clear understanding of London's historic environment. It concerns the identification, understanding, conservation, and enhancement of the historic environment and heritage assets, with an aim to improve access to, and the interpretation of, the heritage assets. It states that:

> Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. 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

Camden Council's Local Plan

Policy D2 Heritage

27) The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

- 28) Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
 - a. the nature of the heritage asset prevents all reasonable uses of the site;
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation:
 - conservation by grant-funding or some form C. of charitable or public ownership is demonstrably not possible; and

- d. the harm or loss is outweighed by the benefit of bringing the site back into use.
- The Council will not permit development that results 29) in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

- 30) Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.
- 31) The Council will:
 - require that development within conservation Д areas preserves or, where possible, enhances the character or appearance of the
 - f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
 - resist development outside of a conservation g. area that causes harm to the character or appearance of that conservation area; and
 - h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage

Listed Buildings

- 32) Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:
 - resist the total or substantial demolition of a listed building;
 - resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
 - resist development that would cause harm to k.



significance of a listed building through an effect on its setting.

Archaeology

33) The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets and non-designated heritage assets

- 34) The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.
- 35) The effect of a proposal on the significance of a nondesignated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

