# Kings Court, 2-16 Goodge Street London Borough of Camden

HERITAGE, TOWNSCAPE & VISUAL IMPACT ASSESSMENT | AUGUST 2023

On behalf of E&A West End Properties Limited



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# KINGS COURT - 2-16 GOODGE STREET | CAMDEN



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# Section 1 Introduction.

1 Introduction

## Introduction

- 1.1 This Heritage Statement has been prepared on behalf of E&A West End Properties Limited ('the Applicant') to support a full planning application at Kings Court 2-16 Goodge Street W1T 2QA ('the Site') within the London Borough of Camden. It provides an assessment of the anticipated heritage impacts of the proposed development.
- 1.2 The Site is listed Grade II and is located within the Charlotte Street Conservation Area.
- 1.3 This report will:
  - Set out the relevant legislative and policy framework within which to understand the proposed development of the site;
  - Provide a proportionate and robust analysis of the site and surrounding area's historic development;
  - Describe the site and identify relevant heritage assets, their significance and the contribution of their setting to significance;
  - Provide an assessment of the potential effects to the setting of identified heritage assets resulting from the proposed development.
- 1.4 The report is produced by Iceni Projects. Specifically, it is authored by Oliver Taylor BA (Hons), Consultant, with review by Rebecca Mason, BA (Hons), MA, IHBC, Associate. Laurie Handcock MA (Cantab) MSc IHBC MCIfA, Director Built Heritage & Townscape has provided Director sign off.



Figure 1.1 The Site (outlined in red indicatively)

# Section 2

# Relevant Planning Policy, Legislation & Guidance.

# 2 Relevant Planning Policy, Legislation & Guidance

### Introduction

- Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
- Section 66 (1) of the Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that the local planning authority 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.'
- Section 72 (1) of the Act states that with respect to buildings or land in Conservation Areas 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'
- Relevant development plans include the Camden Local Plan (adopted 3 July 2017) and the London Plan (adopted 2021).
- The National Planning Policy Framework (2021) is a material consideration.
- Relevant guidance includes:
  - National Design Guide (2021)
  - National Model Design Code (2021)
  - · Historic England guidance

## **National Policy**

### National Planning Policy Framework (NPPF, July 2021)

- At the core of the National Planning Policy Framework ("NPPF), is the focus on sustainable development.
- Section 12, 'Achieving well-designed places', reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in paragraph 130, the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- Paragraph 134 advises that 'significant weight' should be given to:
  - (a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes; and/or
  - (b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."
- 2.10 Section 16, 'Conserving and enhancing the historic environment', encourages intelligent, imaginative and sustainable approaches to managing change. Historic England has defined this approach as 'constructive conservation' (Constructive Conservation in Practice, 2009.)
- 2.11 Paragraph 194 states that, when determining applications, local planning authorities should require applicants to describe the significance of the heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.
- 2.12 Paragraph 197 emphasises that local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage

- assets and putting them to viable uses consistent with their conservation; 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.
- 2.13 Paragraph 199 states 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. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and notes that this great weight should be given irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 2.14 Paragraph 203 requires a balanced judgment for proposals that affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.

### National Guidance

## National Design Guide (2021)

- 2.15 In September 2019, the Ministry of Housing, Communities and Local Government (MHCLG) produced a National Design Guide illustrating how well-designed places that are beautiful, enduring and successful can be achieved in practice. It was updated in 2021 and forms part of the PPG.
- The Guide recognises that well-designed places have individual characteristics which work together to create its physical character. It introduces 10 specific characteristics that would need to be considered when considering new development. These are:
  - · Context enhances the surroundings which should: understand and relate well to the site, its local and wider context (C1) & value heritage, local history and culture (C2).
  - Identity attractive and distinctive and designed to: respond to existing local character and identity (I1), be well-designed, high quality and attractive places and buildings (12) & create character and identity (13).

- Built form a coherent form of development which includes: a compact form of development (B1), appropriate building types and forms (B2) & creates destinations (B3).
- · Movement accessible and easy to move around, comprising: a connected network of routes for all modes of transport (M1), active travel (M2) & well-considered parking, servicing and utilities infrastructure for all users (M3).
- · Nature enhanced and optimised to: provide a network of high quality, green open spaces with a variety of landscapes and activities, including play (N1), improve and enhance water management (N2) & support rich and varied biodiversity (N3).
- Public spaces safe, social and inclusive which: create well-located, high quality and attractive public spaces (P1), provide well-designed spaces that are safe (P2) & make sure public spaces support social interaction (P3).
- Uses mixed and integrated comprising: a mix of uses (U1), a mix of home tenures, types and sizes (U2) & socially inclusive uses (U3).
- Homes and buildings functional, healthy and sustainable by providing: a healthy, comfortable and safe internal and external environment (H1), well-related to external amenity and public spaces (H2) & attention to detail with storage, waste, servicing and utilities (H3)
- · Resources efficient and resilient by ensuring that they: follow the energy hierarchy (R1), include careful selection of materials and construction techniques (R2) & maximise resilience (R3).
- · Lifespan made to last by being: well-managed and maintained (L1), adaptable to changing needs and evolving technologies (L2) & with a sense of ownership (L3).
- 2.17 MHCLG recently published the National Model Design Code (2021) which sets out detailed standards for successful design, drawing from the findings of the Building Better, Building Beautiful Commission.
- The Guide acknowledges that quality design does not look the same across different areas of the country, for instance, that by definition local vernacular differs. MHCLG, therefore, expects

# 2 Relevant Planning Policy, Legislation & Guidance

that local planning authorities develop their own design codes or guides, taking into consideration the National Model Design Code. These would be expected to set clear parameters for what good quality design looks like in their area, following appropriate local consultation.

This supports paragraph 134 of the NPPF, which requires that "development that is not well designed should be refused".

### Planning Practice Guidance ("PPG") (June 2021)

- 2.20 The guidance on Historic Environment in the PPG supports the NPPF. Paragraph 002 states that conservation is an active process of maintenance and managing change that requires a flexible and thoughtful approach, and that neglect and decay of heritage assets is best addressed through ensuring that they remain in active use that is consistent with their conservation.
- Paragraph 006 sets out how heritage significance can be understood in the planning context as archaeological, architectural, artistic or historic:
- The PPG emphasises in paragraph 007 the importance of assessing the nature, extent and importance of a heritage asset in understanding the potential impact and acceptability of development proposals.
- The PPG also provides clear guidance in paragraph 020 on the meaning of 'public benefits', particularly in relation to historic environment policy. The PPG makes clear that public benefits should be measured

according to the delivery of the three key drivers of sustainable development: economic, social and environmental outcomes, all of which are reflected in the objectives of the planning system, as per Paragraph 8 of the NPPF. Public benefits include heritage benefits, and 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.

## Local Development Plan

### The London Plan (2021)

- 2.24 Regional policy for the London area is defined by the London Plan. The New London Plan has now been adopted (March 2021). The policies relevant to this application are summarised below.
- 2.25 Policy GG2 requires that proposals make the best use of land by meeting the following requirements [among others not relevant to this assessment]:
  - "...C. proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling

D. applying a design-led approach to determine the optimum development capacity of sites

E. understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character...'

- Policy D3 requires that 'all development must make the 2.28 best use of land by following a design-led approach that optimises the capacity of sites...[meaning] ensuring that development is of the most appropriate form and land use for the site'. Among other requirements, relevant to this assessment are the following:
  - 1 'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions'

- 6 'provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest'
- 11 'respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character'
- Policy HC1 Heritage Conservation and Growth requires boroughs to develop evidence that demonstrates a clear understanding of London's historic environment. It further requires Boroughs to use this knowledge to inform the effective integration of London's heritage in regenerative change by:
  - a. 'setting out a clear vision that recognises and embeds the role of heritage in place-making;
  - b. utilising the heritage significance of a site or area in the planning and design process;
  - c. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place; and,
  - d. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing."
- Part C E of Policy HC 1 state 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. 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 has a number of supplementary planning guidance/documents, known in Camden as Camden Planning Guidance documents (CPGs), along with Conservation Area Appraisals which form material considerations for this application.
- In addition, the London Borough of Camden are 2.30 also in the process of preparing their new Local Plan having recently completed the initial engagement stage in January 2023. A new Draft Local Plan and Site Allocations document is expected to be published for public consultation in Autumn 2023.

### Camden Local Plan (2017)

### Policy D1 Design

- 2.31 The council will:
  - 'seek to secure high quality design in development'
- This will include ensuring that design respects local character and context and preserves or enhances the historic environment. Design must be sustainable and of a high quality.

## Policy D2 Heritage

2.33 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.'

On conservation areas the council will:

'require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area'

On listed buildings the council will:

'resist development that would cause harm to significance of a listed building through an effect on its

The Site is located within the Charlotte Street Conservation Area. The appraisal for this, which forms additional guidance, will be explored further in this report.

# Section 3

# Historic Development of the Site & Surroundings.

# 3 | Historic Development of Site & Surroundings

- Up until the mid 18th Century, the Site was part of open agricultural land to the northeast of the city (see figure 3.1), which at this point was traversed via Tottenham Court Road, leading from London to the ancient manor of Tottenham Court. The land around the Site was primarily owned by this manor, which was purchased by the Fitzroys towards the end of the 18th Century. It was this purchase which led to the urbanisation of the area that is now called Fitzrovia, centred around the grand development of Fitzroy Square (designed by the Adam brothers and begun in the 1790s).
- It was during this late 18th Century period of development that the land on which the Site is located was developed, from the 1750s onwards, and this can be seen in Horwood's map of 1799 (figure 3.2). The map shows rows of terraced buildings of speculative development laid out east to west from Tottenham Court Road to Whitfield Street, forming a small block. The Site partially faces Whitfield Street, which itself is named after the Reverend George Whitefield who in 1741 founded the church known as Whitefield's Tabernacle just to the north of the Site's location. However, the street is more primarily influenced by Goodge Street on which most of its elevation is focussed, which ran east to west from Tottenham Court Road.
- During the later 18th and 19th centuries the area declined in popularity as a residential suburb for the wealthy and became more mixed, attracting artists, craftsmen and immigrant communities from Europe who established businesses. Shops and public houses were developed or inserted into older buildings and a mix of residential uses, cafes and small businesses established at ground level. This was particularly true for Goodge Street.
- Prior to its redevelopment, the site can be seen in one of Tallis's drawings of Goodge Street, dated 1838 (see figure 3.3). It shows the previous buildings between Tottenham Court Road and Whitfield Street as a short row of eight structures. The designs show broad similarities, with ground floor shops, large sash windows on the first and second floors, and smaller attic windows on the third, with some slight variations, particularly to rooflines. The Site, occupying a corner plot of a busy commercial road, has a greater degree of prominence. At this time it is operating as a wine and spirit store.



Figure 3.1 Rocque's Map of London (1746). Approx. Site location circled. Source: layersoflondon.org



Figure 3.2 Greenwood's Map of London, 1828. Approx. Site indicated. Source: layersoflondon.org



Figure 3.3 Horwood's Map of London, 1799. Approx. Site indicated. Source: layersoflondon.org

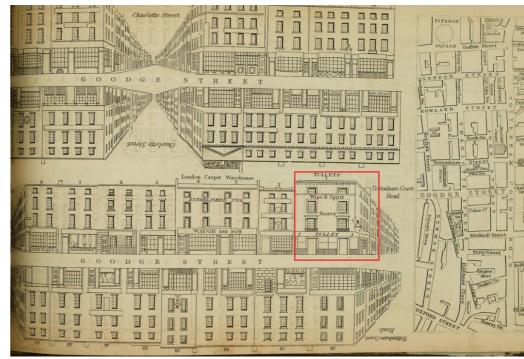


Figure 3.4 Tallis's Views of Goodge Street, 1838. Site identified in red. Source: layersoflondon.org

# 3 | Historic Development of Site & Surroundings

- This continuity in design is reflected in the opposing row across Goodge Street in Tallis's drawing. As a result, the character of the area was broadly consistent, certainly at the time of its construction in the 18th Century, with the beginnings of modifications in the 19th Century. In OS mapping of the 1870s (see figure 3.5), the Site is identified as operating as a public house rather than a shop as it is in Tallis's drawing.
- During the 19th Century and early 20th Century the Site and the surrounding area were further modified. In 1903 the Site was redeveloped with the present, much grander, Free Renaissance style building, which also resulted in the demolishing of buildings along Goodge Street. This can be seen in the OS map of the 1910s (see figure 3.7). Other buildings, such as Whitfield Court, underwent alterations in the 19th Century, being combined into two buildings by the time of the 1870s OS map. It was entirely rebuilt by the 1910s OS map.
- The area suffered greatly during the air raids of WW2, and many of the buildings along Whitfield Street and Goodge Street were destroyed. The Site itself fortunately received no damage and this can be seen in the bomb damage map and in aerial photography, which shows the structures to the west and south of it completely destroyed by a V1 rocket (see figures 3.9 and 3.10).
- In the wider area, larger commercial buildings were also built on the location of bomb damage, beginning the process of modernisation of the surrounding area and the decline of the 18th Century grain which had so characterised the area. The proximity to Central London and the growth of commercial and entertainment industries in the area has catalysed the densification of the urban grain, with the inclusion of taller buildings.



Figure 3.5 OS Map, 1870s Source: National Library of Scotland





Figure 3.6 OS Map, 1890s Source: National Library of Scotland

Figure 3.7 OS Map, 1910s Source: National Library of Scotland







Figure 3.9 Survey of bomb damage, 1945 Source: layersoflondon.org



Figure 3.10 Aerial photograph of the Site, 1948 Source: Historic England

# Section 4

# Site Description and Identification of Assets.

# 4 | Site Description and Identification of Assets

### Site Location

- 4.1 The Site is located along the north side of Goodge Street, within a few metres of Tottenham Court Road which is to its east. To its west is Whitfield Street and the area of the Charlotte Street Conservation Area. The Site is located approximately 85 metres south from Goodge Street Underground Station.
- The Site is therefore located within a busy and prominent commercial area of London, with a large amount of consistent footfall.

# Site Description

- 4.3 The Site comprises of a portion of a larger building which, as a whole, is listed Grade II. The building was constructed in 1903 to designs by Henry Alfred Whitburn in the Free Renaissance Style. The building was initially constructed to house the Catesby Department Store, which had been partially on the site since 1885, as well as a public house (the Talbot).
- The Site is built over four storeys (originally fewer as a mezzanine has been inserted between ground and first). There is a modern extension to the rear, and a somewhat unsightly brick tower has been added to its mansard for access to the roof. The materiality is mainly red brick to the front elevations with a cheaper stock brick to the rear. The brick is accented with Portland Stone and granite, which provides a characteristic Queen Anne revivalist appearance.
- of detailing which is indicative of its Edwardian date.
  These include cartouches, Classical columns and turrets. It is a blend of a variety of influences and thus provides an expressive insight into a period of Revivalist building traditions. Of note are the attractive arched windows, which were intended to provide excellent lighting to the spacious ground floors.
- 4.6 The Site is currently operated as commercial office space.



Figure 4.1 Interior stairwell with lift



Figure 4.2 Interior office on first floor



Figure 4.3 Entrance to Site

# 4 | Site Description and Identification of Assets

# Identification of Assets

- The Site is listed Grade II. It is also located within the Charlotte Street Conservation Area.
- Following an assessment and the limited nature of the proposals, this report will include only assessment of the following assets:
  - · Charlotte Street Conservation Area
  - 64-67, Tottenham Court Road, 2-8, Goodge Street

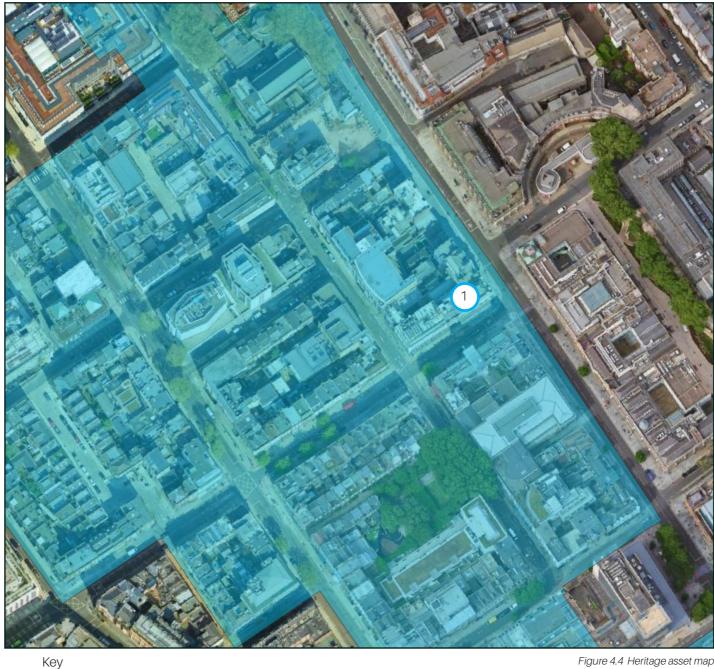


Figure 4.4 Heritage asset map

Charlotte Street Conservation Area



# Section 5 Assessment of Significance.

# 5 Description of Proposals and Assessment of Impact

# Assessment of Significance

### **Listed Buildings**

64-67, Tottenham Court Road, 2-8, Goodge Street (the Site)

- 4.9 Built in 1903 by Henry Alfred Whitburn in the Free Renaissance style as a carpet and linoleum store with a public house on the corner. It now operates as ground floor shops with offices and residences above.
- 4.10 It is significant for its extensive presentation of the Free Renaissance Style, incorporating a rich materiality of red brick, Portland stone and granite. The building features many decorative cartouches and panels, with large arched windows framed by lonic columns. Elegant oriel windows and corner turrets provide visual interest.
- 4.11 Historically the building represents a period of 19th Century Revivalist architecture in Britain employing a combination of different characteristics in its use of early Classicism, early Renaissance and later Baroque Interpretations. It is interesting for its purposefully built multi-use function, with its architecture responding to the needs of the public house along Goodge Street (which incorporates the Site). This features a tighter and more intimate mass with smaller arched windows and a lower profile; and the shop along Tottenham Court Road, with more expansive fenestration and loftier building heights.
- The Site therefore contributes positively to the Charlotte Street Conservation Area and to the activation of the junction of Goodge Street and Tottenham Court Road (the latter of which it is chiefly intended to be experienced from).

### **Charlotte Street Conservation Area**

- 4.13 The initial designation of the Charlotte Street Conservation Area was on 26 March 1974. There were subsequent extensions in 1981, 1985 and 1999.
- 4.14 The Charlotte Street Conservation Area is situated in an area known as 'Fitzrovia' and derives much of its special interest and historic significance from the speculative development phase of 1750-1770 with the three or four storey terraced townhouse being the favoured form. It is therefore historically and architecturally significant for this phase of architectural style and for the mixed commercial use which identifies the late 18th and early 19th

- Century development of commerce in this area of London. This varied mixed use character remains and contributes to the charm of the area today.
- 4.15 The area's spatial character derives from the densely developed grid pattern of streets and limited open space. Development is predominantly four storeys and set back from the street by a small basement area creating a strong sense of enclosure. The sense of enclosure is intensified on narrower streets.
- 4.16 Although a range of building types is evident across the conservation area the predominant building type is the terraced townhouse, predominantly 3-4 storeys in height, which contribute positively to the significance of the CA. Roof forms are often defined by a parapet and create a strong and consistent roof line, however, later expansions have introduced mansard roof extensions.
- 4.17 Later modern infills, often triggered by the demolition of bomb-damaged structures, have caused some harm to the consistency of historic styles, creating islands and breaks and raising the roof height above the traditional 3 or 4 storey roof line. This is also true of building frontages, which even from the 19th Century show evidence of modification to accommodate changing styles or commercial spatial needs (especially true given many of the ground floors operated as shop fronts). Later modern redevelopments are less sympathetic to the character of the CA and, as a result, the architectural significance of the CA has been somewhat degraded by their introduction.
- 4.18 Materiality wise, yellow London stock brick is the predominant material used across the conservation area, reflecting the cheapest locally available material favoured in 18th and early 19th century London. Red brick is used as a contrasting feature and in the late Victorian and Edwardian buildings red brick, stone and stucco are employed as contrasting detailing to create increased visual interest to the street frontages. The corner building to the east of the Site is an example of this, exhibiting the Free Renaissance style which became increasingly fashionable in the 19th and early 20th Centuries.
- 4.19 Modern developments have moved away from these materials, which in some ways has harmed the architectural significance of the CA, however,

follows the natural evolution which had begun in the Victorian period. As a result, there is an increasingly more varied use of materiality, particularly in the case of larger amounts of glazing.

# Section 6

# Description of Proposals and Assessment of Impact.

# 6 Description of Proposals and Assessment of Impact

# **Proposed Development**

- 6.1 The proposals are restricted to the communal circulation areas of the Site, including entrance foyer and stairwells, where the present design scheme is modern but in need of refreshment.
- 6.2 The present scheme is entirely modern and as a result is stark and utilitarian, creating an uninviting space which degrades the attractiveness of the building. The scope, therefore, is to elevate this through the introduction of a variety of design-led materials to the walls, ceilings, floors and staircase.
- 6.3 A full scope of these changes will be submitted with this Heritage Statement, however, an overview of these additions include:
  - new inserted ceilings, in the form of onyx panels mounted in a metal frame to ceiling
  - · aged brass clad wainscotting to stairwells
  - new curved stud plasterboard walls around lifts, including re-cladding of lift doors with aged brass
  - Introduction of plasterboard wall to ground floor stairwell
  - · New reeded glass doors to ground and first floors



Figure 6.1 Proposed Ground Floor CGI

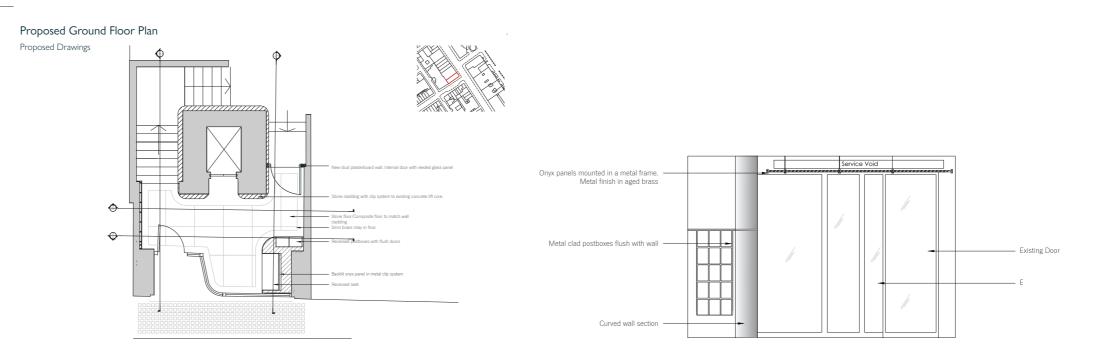


Figure 6.2 Proposed Ground Floor Plan

Figure 6.3 Proposed Ground Floor Elevation

# 6 Description of Proposals and Assessment of Impact

## Assessment of Impact

- As the present design scheme is entirely modern, there are no historic details surviving in the entrance and stairwell areas. As a result of this, the proposed development, whilst introducing a contemporary palette of materiality to the building, will not result in the loss of legibility of the significance of the building.
- There has been significant alteration of the Site's interior since its construction in 1903 and, as a result, much of its original planform and historic detailing has been lost. This is particularly evident on the first floor which is a later insertion. The present design scheme is stark and modern, and detracts from the character of the listed Site, making the interior feel generic and uninviting. This undermines the special interest of the Site within the Conservation Area.
- On this basis, further interior alterations (which in this case are minimal) would not amount to additional harm. Where partitions are to be inserted, these will be minimal and are designed to give improved privacy and security throughout the communal stairwell.
- Overall, it is considered that the proposals are a positive addition to the listed building, revitalising an otherwise nondescript interior, much altered, with high-quality design. This brings a contemporary and inviting appearance to the space, elevating its architectural interest and attractiveness as a commercial space within Camden and in so doing ensuring its future viability.
- As such, we are satisfied that the proposed development meets policy as laid out in paras 197 and 199 of the NPPF. It further meets Camden's local policies D1 on ensuring high quality design and D2 on ensuring design respects and preserves the historic environment.

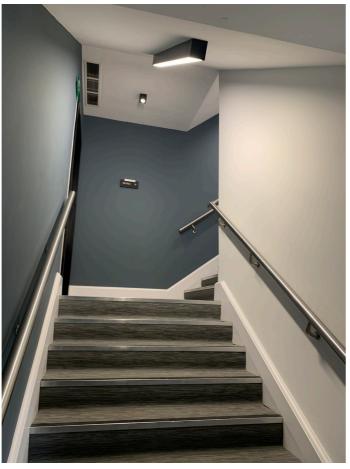


Figure 6.4 Existing stairwell, showing stark modern interior and poor quality

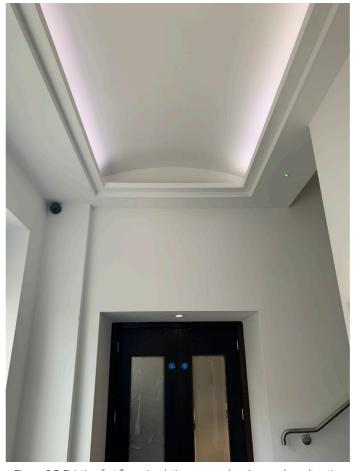


Figure 6.5 Existing first floor circulation space, showing modern alterations to ceilings and modern door insertions



Figure 6.6 First floor circulation space, showing inserted first floor with modern finishes.

# Section 7 Conclusion.

7 Conclusion

- 7.1 This Heritage Statement provides an assessment of the impact of the Proposed Development on the significance of Kings Court, 2-16 Goodge Street and the wider Charlotte Street Conservation Area.
- 7.2 The conclusion found by this Heritage Statement is that the Proposed Development would result in no harm through the minimal renovations proposed to the communal circulation spaces. These communal spaces have, since the Site's construction in 1903, been significantly altered, with the insertion of a first floor and the expansive modernisation of the interior. This has resulted in a generic and stark interior which detracts from the significance of the Site.
- 7.3 The Proposed Development would provide a distinct improvement to the experience of the communal circulation spaces through a refreshed and high-quality interior redecorations, adding visual interest and character. The proposals are limited only to these communal interior spaces and as a result would have no impact on the Charlotte Street Conservation Area.
- 7.4 The Proposed Development therefore satisfies national and local policies relating to design quality and the preservation of the significance of historic assets.



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