

2 Waterhouse Square
London EC1N 2ST

Heritage Statement

July 2023

Consultancy for the
Historic Built Environment

KMHeritage

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1 Introduction

- 1.1 This report has been prepared to support a planning and listed building consent application for proposals affecting No. 2 Waterhouse Square, 138-142 Holborn, EC1 2ST. The report has been prepared for the Prudential Assurance Company Limited.

Purpose

- 1.2 The purpose of the report is to assess the proposed works against national and local policies relating to the historic built environment.
- 1.3 This report should be read in conjunction with the accompanying drawings and Design and Access Statement prepared by Orms submitted with the application.

The proposed development

- 1.4 Planning permission and listed building consent are sought for:

Refurbishment and extension of the existing building at 2 Waterhouse Square comprising the delivery of Class E (commercial) floorspace and a flexible commercial (Class E) and bar (sui generis) unit, external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.

Organisation

- 1.5 This introduction is followed by a description and analysis of the building and its heritage significance in Section 2. Section 3 sets out the national and local policy and guidance relating to the historic built environment that is relevant to this matter. An outline is provided in Section 4 of the proposed scheme and its effects. Section 5 assesses the proposals against that policy and guidance. Section 6 is a summary and conclusion.

Authorship and contributors

- 1.6 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. Kevin was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect and has a specialist qualification in urban and building conservation.
- 1.7 Additional support was provided by Anne Roache MA. MSc. Anne is an experienced heritage professional who has worked for leading commercial organizations in the fields of property, planning and law. She has a specialisation in the archaeology, architectural and social history of London.
- 1.8 Research has been provided by Dr Jonathan Clarke. Jonathan has more than 30 years' experience working in the historic built environment sector including for English Heritage and the Royal Commission on the Historic Monuments of England.

2 The site and its context

Introduction

2.1 The site is located within the Holborn district of the London Borough of Camden on the main thoroughfare of Holborn. Brooke Street and Brooke's Market demarcates its western and northern boundaries whilst Leather Lane demarcates its eastern side.

2.2 The site, No. 2 Waterhouse Square, is part of the Grade II* Listed Waterhouse Square complex and comprises of a 1990s extension to the older buildings making up the site.

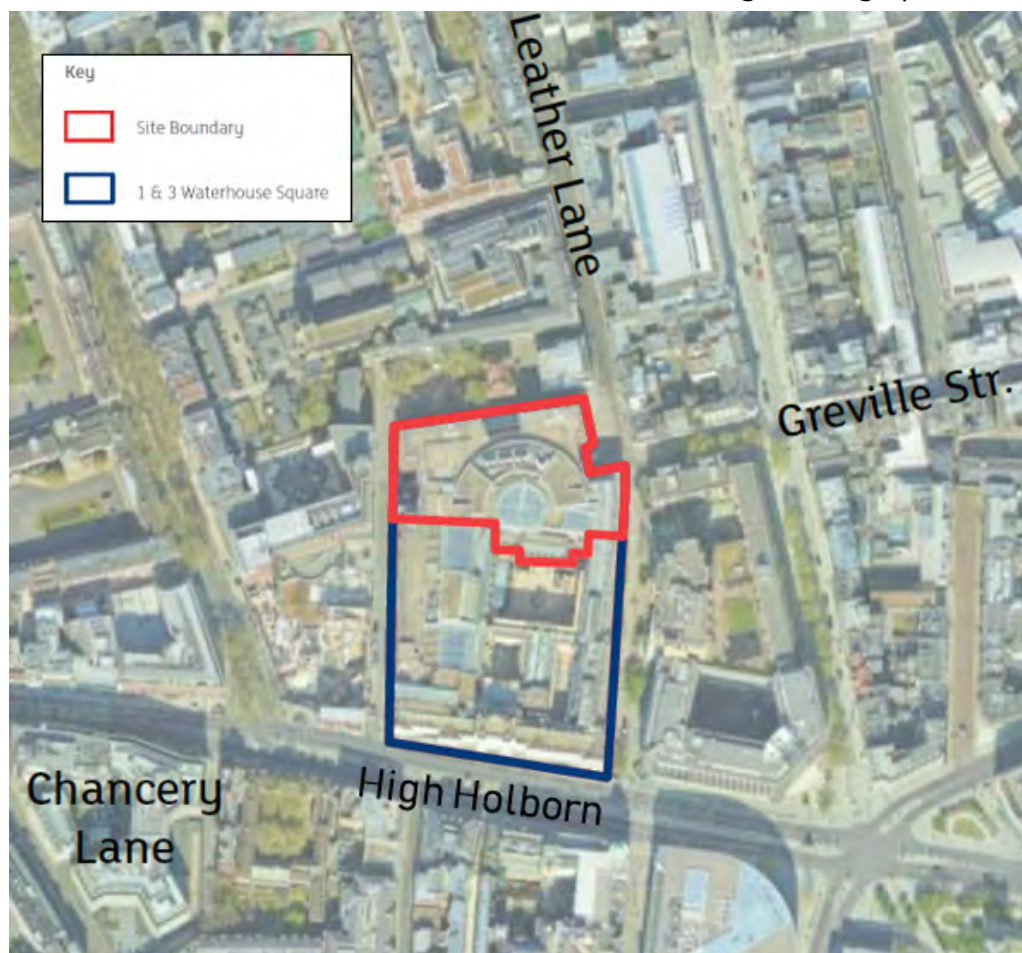


Figure 1: Site location

A brief history of the site context

- 2.3 Holborn formed a part of the Roman route leading west from the walled City of London. The River Fleet, a fast flowing tributary of the Thames, aligned roughly with present-day Farringdon Road, had, by the early 19th century, become an open sewer leading it to be culverted. The Fleet valley can still be discerned however through the area's distinctive topography, evidenced in the steep streets of Greville Street, Back Hill and Herbal Hill.
- 2.4 An important thoroughfare linking the City of London with Oxford Street, Holborn was lined with Inns and large residences, including the Bishop of Ely's Palace whose 13th century foundation is commemorated in Ely Place. In 1581, Sir Christopher Hatton, sometime Lord Chancellor, was gifted the property of Ely Place, by Elizabeth I. Featuring a renowned garden, it gave the area its name of 'Hatton Garden'.
- 2.5 The area around Hatton Garden had an association with metalworking from at least the 10th century, with nearby Fetter Lane being home to armourers working for the Knights Templar. The district became home to a skilled community of craftsmen giving the area its reputation for fine metalworking and jewellery making.
- 2.6 From the 14th century, the area was also a centre of the legal profession being convenient for Lincoln's Inn as well as Chancery Lane which links Holborn to Temple. The surviving 16th century timber-framed façade of Staple Inn on Holborn bears witness to this early period. Gray's Inn, which lies to the west of the site, is the smallest of London's four 'Inns of Court'.
- 2.7 During the 19th century Hatton Garden consolidated its reputation for fine metalworking and high quality jewellery with nearby Clerkenwell being the centre of the allied trade of precision clock and watch making. Printing was also a key trade and metal workers sullied type for Fleet Street. The area east of Farringdon Road was focused

on Smithfield Market, London's premier wholesale meat market which was dominated by a large central market building and served by extensive railway sidings.

- 2.8 A butchers market, Brooke's Market, was established by at least 1685 and Leather Lane is thought to have been established as a street market during the same period. By the late 18th century, many of the lower floors of its houses had been converted into shops and business premises. Brooke's Market closed following the establishment, in 1869, by the City of London, of the new, regularised Smithfield Market. The street market on Leather Lane continued and has developed into one of the largest street food markets in London, catering for the lunchtime needs of surrounding office workers.
- 2.9 Interspersed between the small houses, often used for both work and living quarters, were the churches, schools and public houses which served the community. The Roman Catholic Church of St Etheldreda,¹ on the former Bishop of Ely's property, had managed somehow to survive the Reformation.
- 2.10 Despite its success as a commercial centre, by the middle of the 19th century, the area had become degraded as a result of the noxious processes of metal and glass working as well as being close to the abattoirs and effluence of Smithfield Market; all of which had contributed to the Fleet River long having become a polluted, open sewer which had begun to be culverted by the mid-18th century. Road widening schemes during the 19th century, along with improvements in municipal sanitary provision, contributed to the clearance of many of the narrow lanes and courts which had developed into slums.
- 2.11 The 20th century saw little change in the built landscape until the 1940s when heavy bombing during the Second World War destroyed or gutted many buildings, resulting

¹ Listed GI. It is one of two surviving buildings in London from the reign of Edward I (1272–1307) although it suffered bomb damage in Second World War.

in an extensive rebuilding programme during the post-war period.

- 2.12 In common with other, similar parts of inner London (such as Bermondsey) where manufacturing workshops had persisted into the early 20th century, the post-war period saw a profound change in the way that commercial space was used and older buildings adapted. Manufacturers, printers and light industry increasingly relocated to the outer suburbs into purpose built premises more suited to modern methods of production. Chief amongst these relocators was the newspaper industry and the Mirror Group eventually vacated its HQ at Holborn Circus in 1994.
- 2.13 Some of the older buildings, particularly the handsome, multi-storey, Venetian Gothic warehouses north east of the site, were converted into offices or residential use. Elsewhere, sites were cleared and new mid-rise offices were erected. One such clearance was of the rambling Gamage's department store (founded c.1900) which occupied a whole block east of Waterhouse Square. This closed in 1972 and was demolished; an office and apartment complex being erected in its place.
- 2.14 The area remains a busy commercial and retail centre, buoyed by a refreshed Farringdon station, which is part of the new Elizabeth Line. Hatton Garden remains an internationally renowned centre of the jewellery, and especially, diamond trade and the highly respected Inns of Court continue to thrive.

History of the site

The Prudential Assurance Company and the early development of the site

- 2.15 Founded in 1848, the Prudential Assurance Company grew rapidly to become the largest British insurance company of its age, and 'one of the nineteenth-century

institutions that dominated twentieth-century British life'.² Much of this phenomenal growth was predicated on the success of its '*industrial life assurance as an efficient alternative to the death benefits paid by friendly societies*'³ – and, from the 1870s, its policy of radical modernization, encompassing innovation in staff recruitment (including women), organization, office technology and data processing (including typewriters and dating machines), marketing, and investment.⁴ On this last point, its move into property speculation – building offices for its own business but with large amounts of lettable space – proved felicitous, with its headquarters in London becoming the resplendent archetype.

2.16 By the early 1870s the Prudential had outgrown its longstanding premises at No. 62-64 Ludgate Hill and in 1875 acquired a large new site, Furnival's Inn, on the edge of the City.⁵ Casting about for an architect able to take on a large and prestigious scheme the directors lighted upon Alfred Waterhouse who although 'well enough known in 1875'⁶, was yet to garner the widespread acclaim he enjoyed from the 1880s. It would

² Westall, OM review of 'A Sense of Security: 150 Years of Prudential' by Laurie Dennet, *The Economic History Review*, New Series, Vol. 52, No. 1 (February 1999), p. 159

³ *Ibid.*

⁴ *Ibid.*; Cunningham, C. and Waterhouse, P., *Alfred Waterhouse 1830–1905: Biography of a Practice* (Oxford: Clarendon Press, 1992), 112

⁵ *Ibid.* The Prudential Assurance Board Company Board Minutes (4 November 1875) record that 'it would be advisable to secure ... and build offices with a view to extension as required' on 'an eligible site sufficiently large ... in a position where land has not yet reached such high prices'. Shortly later, the site in Holborn had been identified: 'a plot of ground which having a good frontage and address ... ran back into a small street of poor houses & which it appeared ... might suit the Company's purposes & Mr Horne ... had at the request of Mr Harben inspected the plot ... which be considered would be a most eligible investment for the Company at the price for which he believed it could be obtained'. As quoted in Laurie Dennet in *A Sense of Security: 150 Years of Prudential* (1998), 93

⁶ Cunningham, C., 'The Corporate Image', *Alfred Waterhouse, 1830-1905* (RIBA Heinz Gallery/Prudential Assurance Company Ltd, 1983), 57

seem that it was on the say-so of one of the Directors, Henry Harben, who liked what he had seen of the architect's work – including, probably, the Manchester Assize Courts – and whose *'approval was everything and his veto absolute'*⁷, that the promising architect was selected. Waterhouse was duly appointed in July 1876.⁸

2.17 The degraded site, close to the City, Chancery Lane and the Inns of Court, was both historic and ripe for redevelopment (figs 2 & 3⁹). It included the former site of the erstwhile Furnival's Inn, one of the medieval courts of Chancery. The 16th-century replacement of the original building (which had been given a façade by Inigo Jones in the 17th century) had itself been demolished by the early 19th century, and replaced by the Old Furnival's Inn Hotel. Another 19th-century hotel, Wood's Hotel, stood behind it, on the site of Furnival Inn's courtyard and gardens. And another large building on the site, Brooke House, took its name from the former townhouse of Fulke Greville, Baron Brooke and Lord Chancellor to James I.¹⁰



Figure 2: Extract from 1870 OS map (surveyed 1868 to 1873) showing the site of the new, relocated headquarters of the Prudential in the centre of the image

⁷ Dennet, L., *A Sense of Security: 150 Years of Prudential* (1998), 96

⁸ *Ibid.*

⁹ British Commerce and Industry, v1 1934)

¹⁰ Dennet, *Op. cit.*



Figure 3: The corner of Holborn and Brooke Street, 1878 shortly before the first building for the headquarters was erected

Holborn Bars headquarter buildings, 1876-1906

- 2.18 Bounded by Holborn, Brooke Street, Greville Street and Leather Lane, the large quadrangular site was not, however, available completely vacant. Partly because of the number of sitting tenants, the acquisition took over 20 years, from 1876 to 1898. Construction, to the evolving designs of Waterhouse, lasted from 1876 to 1906, as new plots became available (fig. 4).
- 2.19 The first building was built in 1876-9 on the corner plot facing Holborn and Brooke Street, running back (north) to Greville Street (fig. 5¹¹). This was followed by Nos 30-39 Brooke Street (1880-82; demolished), a speculative development of shops, offices and chambers. Next was a large extension to the offices on Brooke Street and Nos 17-19 Greville Street (1885-8), and finally, the most extensive building phase, lasting from 1895-1906, and embracing the construction of three and four storeyed attic blocks around courtyards on the centre and east side of the site. Much of this last phase was executed by Paul

¹¹ *British Commerce and Industry*, v1 1934

Waterhouse, his father having suffered a disabling stroke in 1901. Such was the extent of the enlarged headquarters building that one architectural periodical could exclaim that *'The building is now larger, we believe, than the great hall at Ypres, and it serves for more occupants and a far larger amount of work than was possible in the Belgian building.'*¹²

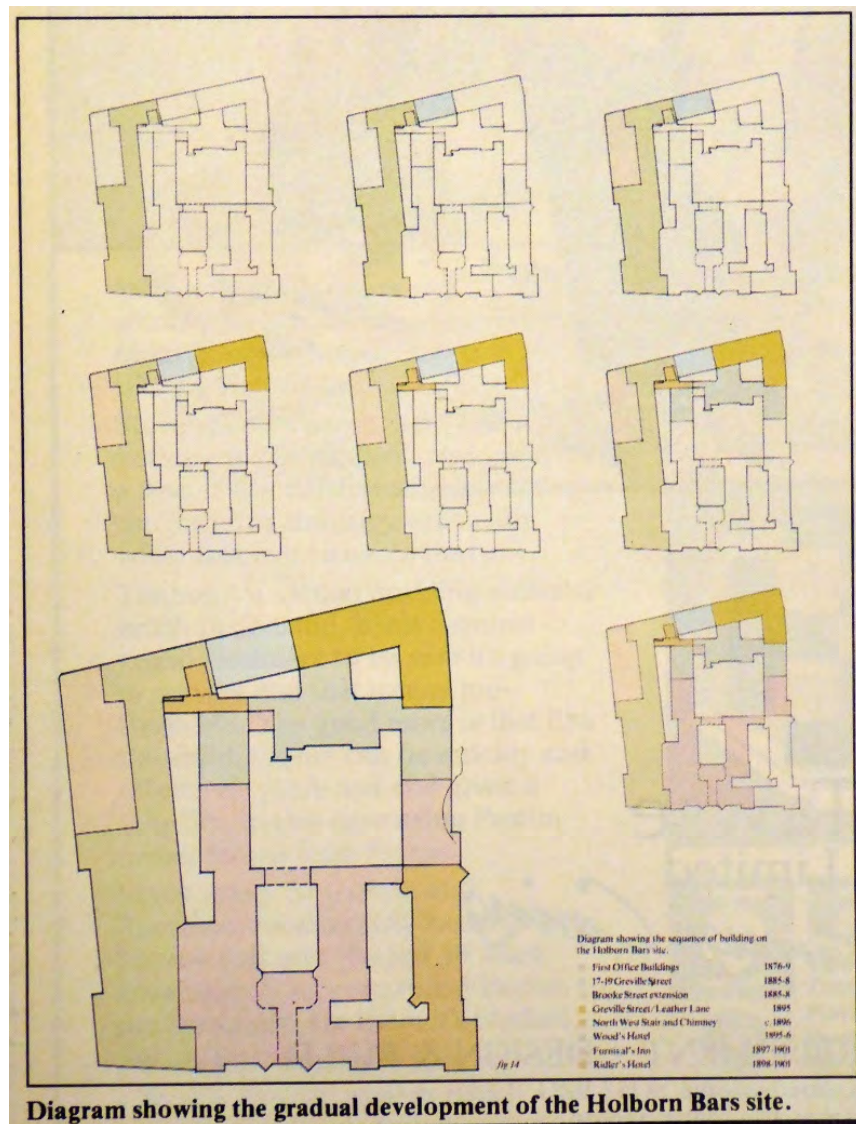


Figure 4: Development of the headquarters site in the period 1876-1905 as deduced by Colin Cunningham and reproduced in Building Design Supplement, August 1989

¹² 'Prudential Assurance Company's New Offices, Holborn Bars, E.C.', *The Architect & Contract Reporter*, 15 July 1904, 40



Figure 5: Engraved view of 1879 showing the first phase of the Prudential headquarters, with Waterhouse's Gothic Revival block

Extensions and additions, 1914-1940s

2.20 Despite the enormity of the prestigious headquarters building at the beginning of the Edwardian period, by its close, further enlargement became necessary. In 1914-15, additional offices were built just north of the complex on the west end of the island site bounded by Brooke Street, Beauchamp Street, Leather Lane and Greville Street (figs. 6¹³ & 7¹⁴). Designed by Prudential architect Joseph Henry Pitt, the Edwardian Baroque-styled Greville House was distinguished by corner tourelles and was possibly steel-framed, with steelwork supplied by Archibald D. Dawnay and Sons, Ltd.¹⁵ It probably formed part of the

¹³ OS TQ3181 - A/Surveyed: 1951, Published: 1954

¹⁴ Historic England Archive, 1947 EAW010039

¹⁵ *The Builder*, 8 January 1915, 40

Prudential's commercial property portfolio, rather than as offices for its own immediate staff (in 1926 it was occupied by Prudential Approved Societies, see fig. 28). Certainly it was not regarded as part of the Chief Offices (see fig. 14), and on the 1951 OS map it was denoted as the Statistical Office of HM Customs and Excise. In 1915, work also began 'on another Prudential building in Dorrington-street, Leather-lane, E.C.'. ¹⁶ Greville House survived until the late 1980s, but it seems likely that the other building was replaced (or incorporated within) the 1930s Hardwick House (see below).



Figure 6: Extract from 1951 OS map (survey date) showing the island site to the north of the Holborn Bars site

¹⁶ *Ibid.*



Figure 7: Extract from aerial view of 1947 looking north-east with the tourelled Hardwick House, c.1925, lower left

2.21 Increasing staff numbers saw the extension of the Waterhouse complex in c.1918-20.¹⁷ This was achieved partly through the construction of a new block to Brooke Street – also executed in a Neo-Classical style (fig. 8¹⁸) – and by raising the Leather Lane wings (1897-1901) to the same height as that fronting Holborn, this being the tallest. Their third, attic storeys were replaced by reinforced concrete-framed third and fourth floors, with the original windows and gables remaining in place, supplemented by additional dormer windows between them. Remarkably, this was executed with seemingly little disruption to the occupants:

“The work of removing the existing roof and constructing the new one had to be done without interrupting or interfering with the general business of the Insurance Company, and the contractors, Messrs. Holland &

¹⁷ ‘Adding a Storey to the Prudential Building’, *The Architects’ Journal*, 10 November 1920, 527

¹⁸ Historic England Archive, BL24701/003

Hannen and Cubitts Ltd., are entitled to be complimented upon the way in which they succeeded in fulfilling this condition. During all the time that the work has been in progress the staff have been working in the rooms immediately below the storey that was being reconstructed, with no signs of the extensive building operations visible except the scaffold poles outside their windows.”¹⁹



Figure 8: The Brooke Street elevation of the Prudential Assurance Co. building, August 1919

¹⁹ *Kahncrete Engineering*, July-August 1920, 86

- 2.22 The new dormers were *'of simple but dignified design ... covered with lead and ... add considerably to the appearance of the buildings'*.²⁰ The main sloping roof and the larger gables were clad with *'slates of a very pleasant greenish-grey colour'*.²¹ The intention was to use the flat portions of the roofs *'as a promenade where the staff can enjoy the air and sunshine in their free time, well above the noise and dust of Holborn'*. Accordingly, they were covered with asphalt and enclosed by iron railings.²²
- 2.23 Internally, despite the use of heavy reinforced concrete framing, including inclined rakers, *'the general effect produced in the interior [was] one of lightness and airiness, due possibly to the wide, open floor space and the excellent lighting'* (fig. 9²³). Paul Waterhouse, in consultation with the Trussed Concrete Steel Co., Ltd, designed this work.

²⁰ *Ibid.*, 88

²¹ *Ibid.*

²² *Ibid.* Such usage of flat roofs in office buildings came into vogue in the 1920s, the most prominent example being Adelaide House, London Bridge approach (1921-24), which had an 18-hole golf green and a roof garden harbouring 70 fruit trees – a lofty haven '170 feet above the roar of the traffic, the river with its chugging tugs and the bellowing of Billingsgate porters' Dundee Evening Telegraph, 18 August 1927, 1

²³ *Kahncrete Engineering*, July/Aug 1920



Figure 9: Views inside the raised attic floors showing reinforced framing that also supported the new flat roofs intended for promenading and staff recreation

2.24 In 1921, a large war memorial was installed in the building's courtyard. Designed by the Swiss-born sculptor, Ferdinand Victor Blundstone (1882-1951), it has a square pedestal with figures at the angles, crowned by a group made up of a dead soldier and two angels. It was designed to fit into the silhouette created by the centre arched opening leading to Holborn, from where it was visible. Despite being commended at the time of its installation for its *'skilful modelling and some very attractive detail'*, it was nonetheless criticised for lacking *'the real monumental character that we hope to see in modern design'*.²⁴ It was formally unveiled in March 1922.²⁵

²⁴ *The Builder*, 21 October 1921, 511

²⁵ *The Builder*, 10 March 1922, 371



Figure 10: War Memorial by Ferdinand Victor Blundstone (1882-1951)

2.25 In 1928 the Prudential ‘propose[d] to build a large addition to their head offices in Leather Lane and Leith Place, W.C.’.²⁶ Plans were prepared by its architect, Joseph Henry Pitt, who retired in 1931²⁷ to be replaced by E. Beavington.²⁸ Whether this proposal came to anything is unclear, but in 1930-32 the Brooke Street block (which included the Neo-Baroque style addition of c1918-19 mentioned above) was largely replaced by new steel-framed ranges by E.M. Joseph. This rose to a new height, seven storeys, and incorporated the original work by Alfred Waterhouse on the corner of Holborn and Brooke Street (fig. 11²⁹). The

²⁶ *The Architect & Building News*, 10 February 1928, 240

²⁷ *The Architect & Building News*, 9 January 1931, 104

²⁸ *The Builder*, 15 December 1933, 964

²⁹ *British Commerce and Industry*, v1 1934

cost of this stripped-classical, structurally expressive work which featured flat roofs for recreation (fig. 12³⁰) was estimated at half a million pounds.³¹ Messrs Joseph – whose commercial office work included the acclaimed Shell-Mex House – seems to have become involved with the Prudential's commercial property operations in the late 1920s, designing blocks of flats for the firm at Melbury Road, Kensington³² and Portman Square (with shops).³³



Figure 11: Messrs Joseph's towering range to Brooke Street c.1934

³⁰ *British Commerce and Industry*, v1 1934)

³¹ *The Architect & Building News*, 20 November 1931, 242

³² *The Builder*, 25 November 1927, 834

³³ *The Builder*, 15 April 1928, 652 7 5 October 1928, 569

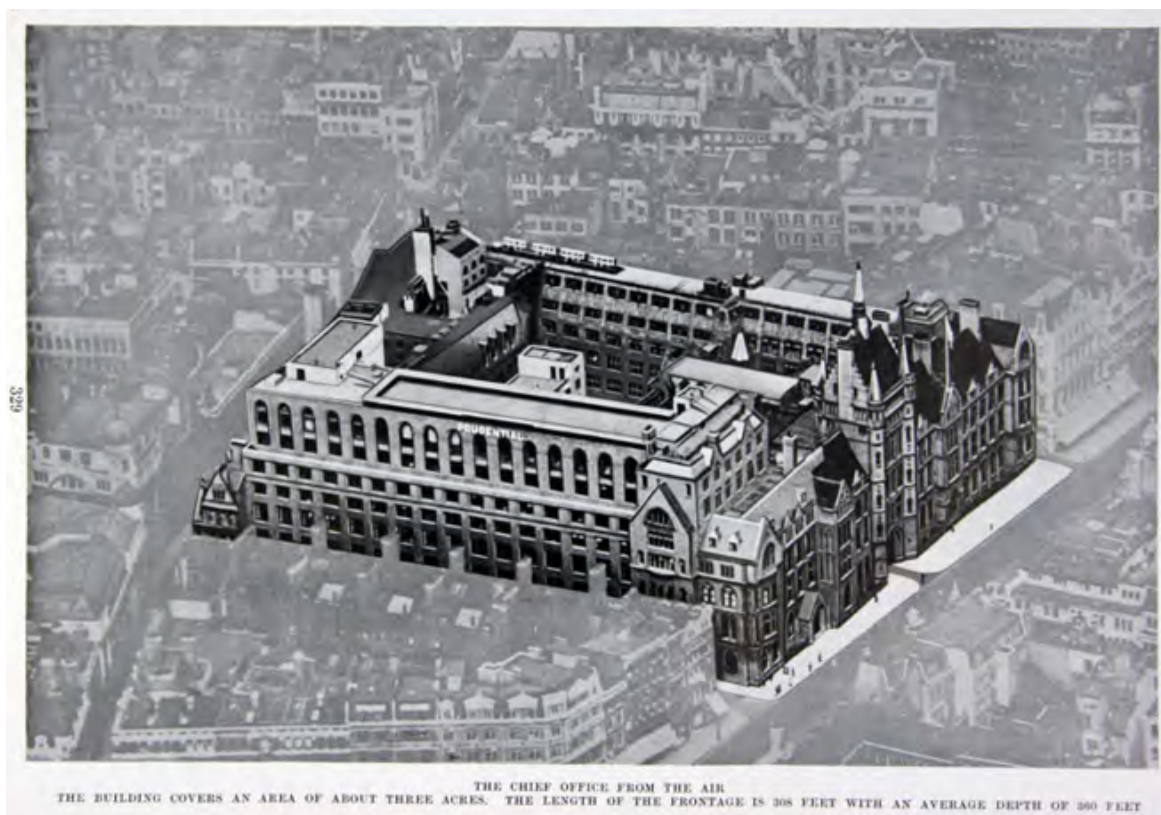


Figure 12: View looking eastwards clearly showing the flat-roofed interwar extensions and additions

2.26 Sometime In the period 1934 to 1947, a large block named Hardwick House was built to the east of, and adjoining, Greville House, occupying most of the island site bounded by Brooke Street, Beauchamp Street, Leather Lane and Greville Street. Although dated to 1918 in the Orms document (and attributed to Joseph, Paul Waterhouse, and structural engineers S.H White and Son),³⁴ it is not visible in the 1934 aerial view (fig. 12), yet is in an aerial photograph of 1943 (see Orms document, p. 20) and 1947 (fig. 13³⁵). It was likely built in the late 1930s, and presumably replaced the WW1-era buildings previously referred to.

³⁴ See WHS-ORM-XX-XX-PP-A-30001_WIP210410, 20

³⁵ Historic England Archive EAW01004



Figure 13: Aerial view looking north, 1947

2.27 The Holborn Bars site was largely spared Second World War bombing, and no major additions to the building envelope were made in the 50 years following the construction of Hardwick House (fig. 14³⁶). The Prudential headquarters were listed Grade II* in 1972,³⁷ reflecting a growing appreciation of Victorian architecture and the work of Alfred Waterhouse.³⁸

³⁶ Building Design Supplement, August 1989

³⁷ NHLE: historicengland.org.uk/listing/the-list/list-entry/1379064

³⁸ Alfred Waterhouse (1830-1905) designed some of the most prestigious buildings of the Victorian era. Known for his Victorian Gothic style, his most recognisable buildings, alongside the Prudential HQ, are, perhaps, Manchester Town Hall and the Natural History Museum, London

Late 20th century



Figure 14: Aerial view looking north, c.1988

- 2.28 Keen to maintain its market leadership in financial services, the mid-1980s saw the Prudential considering how new computerised hardware might be integrated into the Listed complex. Space planners DEGW were commissioned to consider its requirements for modern electronic offices, and Dr Colin Cunningham – the authority on Waterhouse – was commissioned to produce a ‘history and appreciation’ of its headquarters.
- 2.29 Based on this, including Cunningham’s estimation that blocks to the side and rear may not be by Waterhouse, and were ‘*expendable in the cause of progress*’,³⁹ a scheme of modernisation, enlargement and renovation was embarked upon. In 1989 DEGW produced a strategic plan for the refurbishment and redevelopment of the whole site, and from 1990 – 1993 the work was executed,

³⁹ ‘Prudent Improvement’, *Building*, 4 December 1987, 49

initially by DEGW in consultation with the Prudential's own architects, EPR Architects, but completed by the latter.⁴⁰ A phased redevelopment was planned so that staff disruption was minimised, split into three parts, comprising the East, West and North Courts, each of which contained differing proportions of old and new accommodation. (fig. 15⁴¹).



Figure 15: Outline plans from 1994 and 2011 showing the three areas the Holborn Bars into which the complex was divided

2.30 The East Court (Building 1 in fig. 15) is made up of the late 1890s/early 1900s Waterhouse work facing Holborn and Leather Lane, including part of the so-called 'Furnival's Inn' block (1897-1901), and the whole of the 'Ridler's Hotel' block (1898-1901) (see fig. 4). The Funival's Inn part was restored, with air-conditioning and modern servicing introduced, whereas the Ridler's Hotel portion was stripped back to the structure.

⁴⁰ 'A three-part fit-out in the City, *The Architects' Journal*, 30 March 1994, 41

⁴¹ *Architects' Journal*, 30 March 1994; WHS-ORM-XX-XX-PP-A-30001_WIP210410, 20

- 2.31 The South Court (Building 2) is a new building by EPR Architects erected in 1993, albeit incorporating a small part of the Waterhouse elevation of 1895 along the former line of Greville Street.
- 2.32 The West Court (Building 3) is a new building by EPR Architects erected in 1993, albeit incorporating original Waterhouse corner blocks to Holborn (1876-9) and Greville Street (1885-8) the west part of the Furnival's Inn block, and a portion of the 1930-32 block by EM Joseph. Restored, with air-conditioning and servicing, it incorporates the original boardroom, executive offices and library, and was occupied (until 1999) by the Prudential as its international headquarters.⁴²
- 2.33 Essentially, therefore, there is a north-west/south-east divide between the new work and the refurbished older parts, with the new buildings occupying the northern part of the 1.2ha site (fig. 16⁴³).

⁴² *The Times*, 23 September 1992, 24

⁴³ *Building Design*, Supplement, August 1989

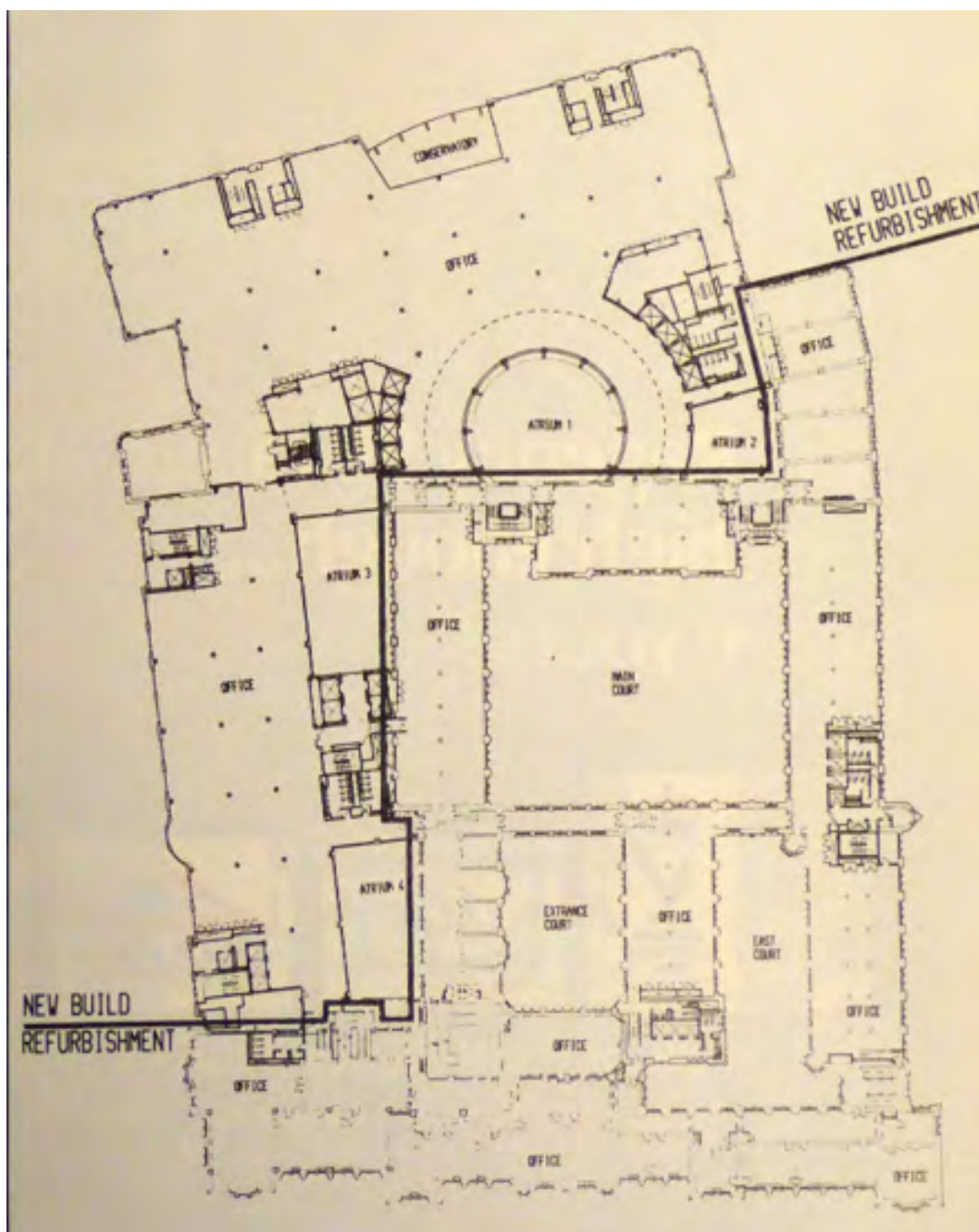


Figure 16: Typical floor plan of the 1993 development showing relation between new and refurbished historic work

2.34 The new build, executed in a Post-Modern style using terracotta and pink granite facings to complement the Waterhouse buildings, is of relatively deep plan, with four atria employed to allow as much daylight as possible into the interior. Such was the scale of this building that

Greville Street, Hardwick House and Greville House were all demolished and their sites built over (fig. 17⁴⁴).

- 2.35 This northern portion of the new build, originally called ‘Holborn Bars North Court’,⁴⁵ formed the greater part of the newly assigned identifier, 2 Waterhouse Square (fig. 18⁴⁶). It featured the largest of the atria, circular on plan and encompassing a ‘ramp-and-twist staircase’ linking the ground and first floors. The Prudential’s main entrance was relocated to lead directly into this lofty space, which was intended to be a ‘point of focus within the building’,⁴⁷ ‘milling space for meeting rooms, waiting and exhibition space, as well as an opportunity for displaying artwork’.⁴⁸ Its centrepiece was the ‘Holborn Bars Kugel’ – a five-and-a-half-ton sphere of solid granite sitting in a cupped granite base, separated by a thin film of water that allowed the Kugel to spin freely (fig. 19⁴⁹). In other core areas, Prudential’s art collection was put on display.⁵⁰

⁴⁴ *Building Design*, Supplement, August 1989

⁴⁵ *The Evolution of Holborn Bars, 1879-1993* (Prudential, 1993), 20

⁴⁶ WHS-ORM-XX-XX-PP-A-30001_WIP210410, 20

⁴⁷ ‘Corporate Identity’, *Building Design* Supplement, August 1989, 39

⁴⁸ David Jenkin (Director, DEGW), ‘A three-part fit-out in the City’, *Architects’ Journal*, 30 March 1994, 44

⁴⁹ *The Evolution of Holborn Bars, 1879-1993*

⁵⁰ Jenkin, *Op. cit.*

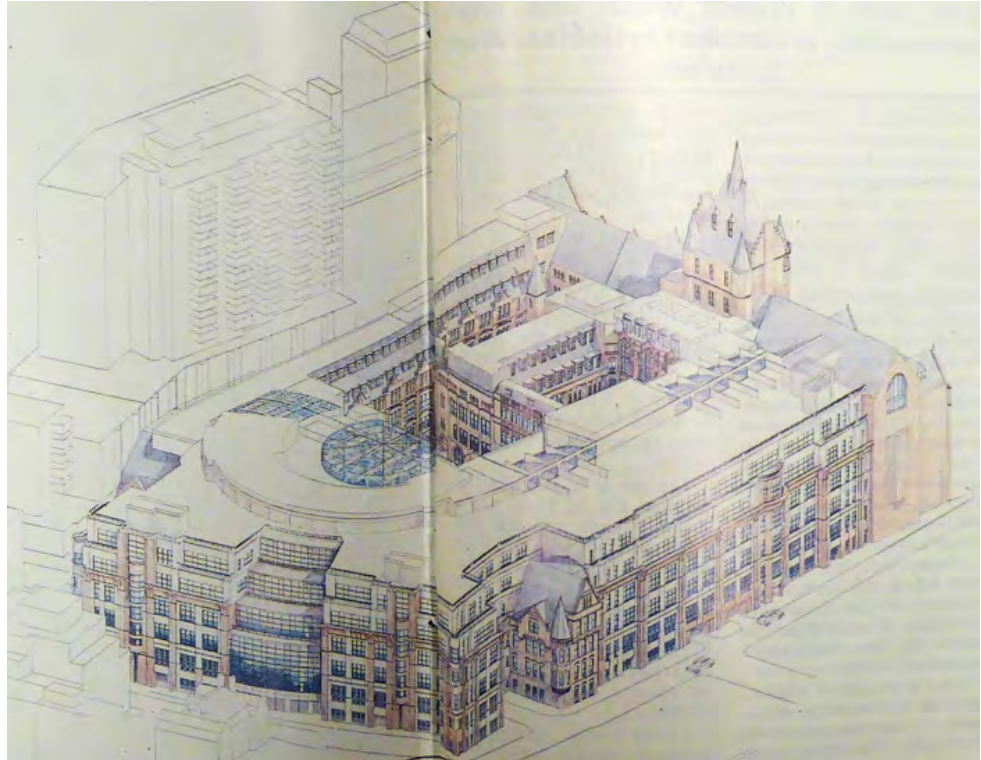


Figure 17: Axonometric drawings by EPR showing in the foreground the proposed new work



Figure 18: View looking south-west in 2021, with 2 Waterhouse Square outlined in red



Figure 19: The Holborn Bars Kugel

2.36 The Beauchamp Street elevation featured a conservatory that also introduced light into the interior (fig. 20⁵¹). Externally, the upper two floors stepped back behind the cornice in a conscious echo of the mansarded Waterhouse, and set-backed flat-roofed interwar additions and extensions (fig. 21⁵²).

⁵¹ *The Evolution of Holborn Bars, 1879-1993*

⁵² *Ibid.*



Figure 20: Views of the Conservatory in the North Court (2 Waterhouse Square)



Figure 21: Beauchamp Street elevation of the North Court (2 Waterhouse Square) showing glass-walled atrium and set-back upper storeys

- 2.37 The Prudential vacated the portions of the building it occupied (much of the renovated and new space being leased out) in 1999, but retained ownership of it. In the same year the List description was amended, although this detailed only the surviving historic exterior and interior fabric and spaces.⁵³ In 2006 the head office of Egg (the online bank owned by Prudential) was closed, thus severing Prudential's 'last link with its former headquarters in Holborn'.⁵⁴
- 2.38 Externally at least, there has been little change to the Waterhouse Square complex since 1993, apart from some additional low-walled enclosures around servicing plant

⁵³ NHLE: historicengland.org.uk/listing/the-list/list-entry/1379064

⁵⁴ 'Pru Quits Holborn HQ and 200 Jobs Go to India', *Financial Times*, 27 April 2006, 21

on the roofs of the 1989-93 new-build extensions (figs. 22 and 23⁵⁵).



Figures 22 & 23: Aerial views looking eastwards in 1993 and 2021

⁵⁵ *The Evolution of Holborn Bars, 1879-1993; Bing.com]*

The heritage context of the site

- 2.39 The heritage context of the site has been established through a search of the Greater London Historic Environment Record, the National Heritage List for England and online resources provided by Camden Council.
- 2.40 The site is Grade II* Listed and lies within the Hatton Garden Conservation Area.
- 2.41 Figure 24 shows LB Camden heritage assets in the vicinity of the site.

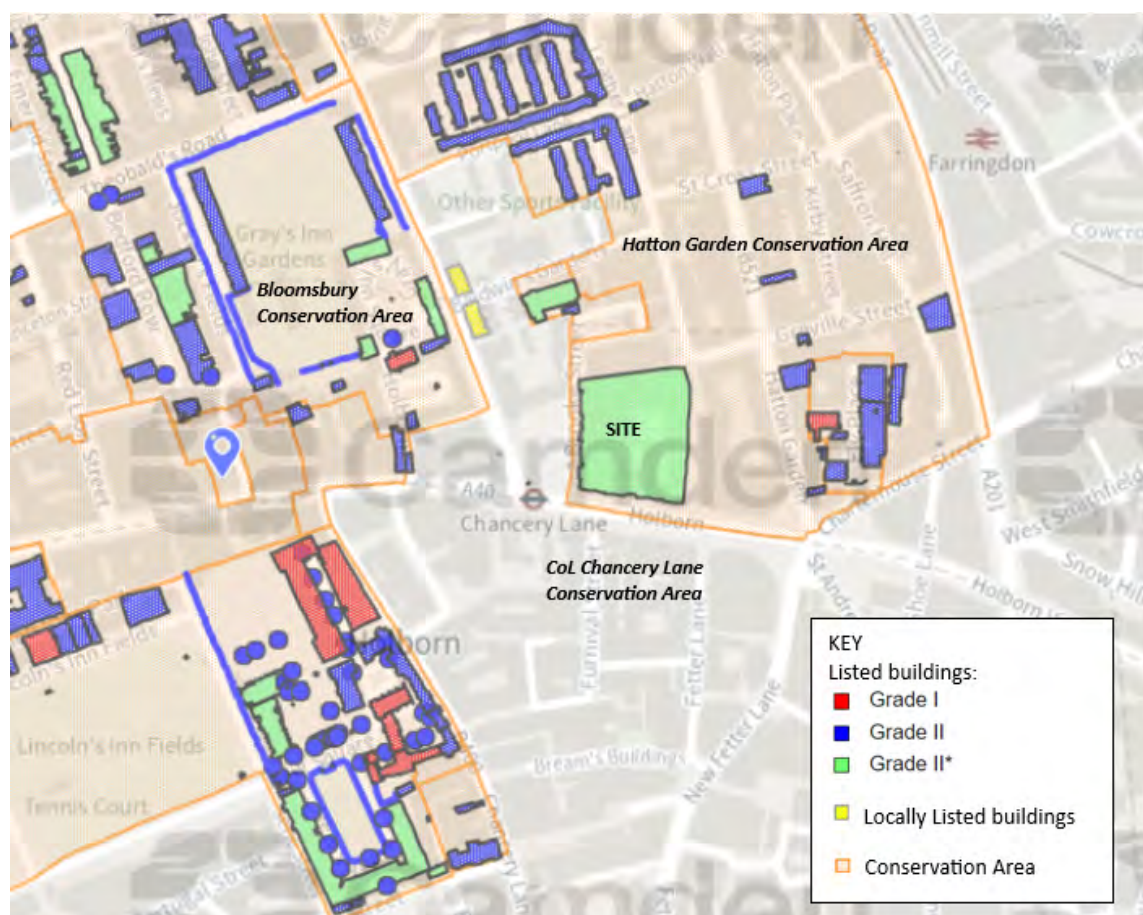


Figure 24: LB Camden heritage assets in the vicinity of the site

Waterhouse Square

2.42 The site is listed Grade II* under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest. The 'listed building' is referred to in this report as 'Waterhouse Square'.

2.43 The listing entry reads:

Prudential Assurance Building, 142 Holborn Bars

Grade: II/ List Entry Number: 1379064 / Date first listed: 03-Mar-1972 / Date of most recent amendment: 11-Jan-1999*

Office block. 1885-1901 in several phases, by Alfred Waterhouse assisted by his son Paul and with additions of 1930-32 by EM Joseph not entirely replaced by rebuilding of 1989-93 and which include 1878-9 fragments.

Polished granite, red brick, red terracotta and much use of fine ironwork, with roof in most areas of slate laid in diminishing courses. The 1930s work with internal steel frame, but the building is made coherent despite the many phases by the use of similar materials of a very restricted colour range.

Style: boldly detailed and picturesque Gothic Revival style.

Plan: complex plan, dominated by front range of 1897-1901, the Furnival's Inn building campaign. To left or west of this range is the steel-framed range of 1930-32 by EM Joseph in matching style, on the site of the first Prudential development on the site of 1879-83 and now truncated; however the late C20 work along Brooke Street incorporates within it a three-window range of 1885-8 by Waterhouse. East of the Furnival's Inn block and returning along Leather Lane is the so-called Ridler's Hotel block, of 1897-1901. North of this are the Wood's Hotel range of 1895-6 and Greville Street/ Leather Lane block of 1895. Large internal courtyard now known as Waterhouse Square, with smaller courtyard to south.

Exterior: Holborn Bars elevation (part of Furnival's Inn building campaign) has carriageway arch flanked by pedestrian arched walkways in range that terminates in tower with hipped roof

and fleche. Three window ranges to either side, the centre of which is topped by a gabled dormer; terminating these ranges are full-height rectangular bays finishing in facing gables, three-window segmental bay to each.

To the left or west the 1930-32 range is seven storeys in the main, but the ranges to Holborn Bars continue the facade height of the Furnival's Inn building. Joseph's work has four-window range contiguous with Waterhouse's and terminating, at the corner with Brooke Street, in a rectangular bay. There is a short return along the west of two-window ranges before the building steps up to a full seven-storey high wing of three windows. Joseph's range further north along Brooke Street has been replaced by recent construction. Embedded in this late C20 work is a three-window range of 1885-8 with four-window return to north; on the corner is a polygonal turret finishing in a high hipped roof.

To the east of the Furnival's Inn block and returning along Leather Lane the Ridler's Hotel parcel has a five-window range continuing from the Furnival's Inn range and terminating in a rectangular corner wing or block. The return continues the design of the main block before setting back along the long Leather Lane elevation, which has a basement area enclosed by railings of an authentic design.

This build of 1897-1901 continues to just north of the angled bay which terminates in a turret with a conical roof; although the material is similar to that found on the main Holborn Bars elevation the detailing is considerably simplified. East of the angled bay / tower is two-storey, flat-roofed block of two-window range; behind this are ranges of the Furnival's Inn campaign once again, here exactly matching the design of the Ridler's Hotel block. To the north of the bay which contains a pedestrian way to the north courtyard is the Wood's Hotel block, which has a four-window range.

North of this point, marked by a hefty half-round, attached shaft, the elevation cambers westwards for nine windows. This is the Greville Street and Leather Lane block, and it terminates near the corner in two facing gables; there is a short return westwards along the former line of Greville Street. The design of

the elevation to this north-east block are the simplest in the whole complex but still match the colour of the other elevations.

The north courtyard is now named in honour of Waterhouse. Its north range is four windows wide flanked by gable facing pavilions and it is part of the Wood's Hotel block. The northernmost bays of the east and west ranges of this courtyard are also part of this campaign. The southern parts of these ranges and that along the south are part of the Furnival's Inn campaign, as is the narrow carriageway to the south entrance courtyard. The 1914-18 War Memorial is now relocated to the north-east corner of Waterhouse Square. Bronze memorial plaques are nearby, flanking the entrance from Waterhouse Square to Leather Lane. These latter commemorate the 1939-45 war.

Interior: significant interiors include the public office on the ground floor of Furnival's Inn block and the Director's Staircase. Both are sheafed in faience. The Library is the only room to survive with most of its original fittings, including lights. Other interiors of special interest in the Furnival's Inn block include: on the first floor the suite of manager's offices retains mahogany panelling in one of the tower rooms and all the rooms to the east. A number of rooms on the second floor have good panelling, plaster ceilings and fireplaces. The faience in the Cashier's Office is particularly noteworthy. Panelling from the 1878-9 Board Room was used in the Director's Rest Room.

(Cunningham C and Waterhouse P: Alfred Waterhouse, 1830-1905, Biography of a Practice, Oxford: 1992).

Conservation areas

- 2.44 Waterhouse Square is located within the Hatton Garden Conservation Area, in the London Borough of Camden. The conservation area was first designated in 1999 and the revised Hatton Garden Conservation Area Appraisal and Management Strategy was adopted in August 2017.
- 2.45 The Conservation Area covers approximately 20 hectares. Its character derives largely from its, intricate street pattern of narrow lanes, courts and streets overlaid on the unusually hilly topography; a reminder of its location in the valley of the former River Fleet. These features

combine to give a strong feeling of enclosure with very few long views. Within this grid are many tall and robustly detailed late 19th century tall brick warehouse and showroom buildings, many in the highly decorated Venetian Gothic style, interspersed with smaller, plain stock brick residential buildings dating from the 18th and early 19th centuries. These, in their turn, contrast with post-war infill commercial buildings.

- 2.46 Although no single period, style or use predominates, it is the area's historical manufacturing and workshop character that pervades - a direct line from the Medieval metal workers who first established their workshops here to the internationally renowned jewellery quarter of today - focused along the spine of Hatton Garden and its side streets.
- 2.47 The site lies within Sub-area 4 'Holborn' which is described in Conservation Area Appraisal as consisting '*of two large mixed-use buildings fronting the traffic dominated street of Holborn*'. One of these being the Waterhouse Square development and the second being the large 1980s office building which was developed on the site of the Gamage's department store.
- 2.48 The Waterhouse Square development is particularly striking. Its highly decorative elevations in red brick and terracotta form important features on Holborn and Leather Lane although the appraisal notes that 'the 1990s additions in purple stone, e.g. on Brooke Street and Brooke's Market, lack interest.' So too does the 1980s office building to the east which is described as being 'at odds with the character of the Conservation Area'.
- 2.49 Nearby, the extensive Bloomsbury Conservation Area lies west of Gray's Inn Road. To the south of the site, Holborn forms part of the boundary between LB Camden and the City of London and the northern boundary of the City of London's Chancery Lane Conservation Area is found opposite Waterhouse Square.

Listed buildings in the vicinity of the site

- 2.50 There are 2 listed buildings within c.100m of the site. These are: The Church of St Alban the Martyr (Grade II*) and St Alban's Clergy House (Grade II) both on Brooks Street.⁵⁶

Locally listed buildings in the vicinity of the site

- 2.51 There are 2 buildings within c.100m of the site boundary which are included on the Camden's Local List. These are classed as non-designated heritage assets. They are 38-54 Gray's Inn Road, late 19th century residential blocks with shops at ground floor level, either side of Baldwins Gardens.

Views

- 2.52 Development on the site has the potential to affect three London View Management Framework Protected Vistas (all London Panoramas): 4A.1 Primrose Hill (Viewing Corridor plus Wider Setting Consultation Area), 5A.2 Greenwich Park (Wider Setting Consultation Area only), and 6A.1 Blackheath Park (Wider Setting Consultation Area only).
- 2.53 2 Waterhouse Square sits in the background of Key View 1 (Cowcross Street looking west toward Farringdon Road/Greville Street corner) as identified in the Hatton Garden Conservation Area Appraisal and Management Strategy. This key view seems intended to terminate at the Hatton Garden/Greville Street junction, with a focus on 88-90 Hatton Garden as a landmark.

The heritage significance of the site and its context

Assessing heritage significance: concepts and terminology

- 2.54 The site and the Hatton Garden Conservation Area are 'designated heritage assets', as defined by the National Planning Policy Framework (NPPF).

⁵⁶ List Entry Number: 1272353 & 1272352

- 2.55 Other buildings and structures identified as having heritage significance can be considered as ‘non-designated heritage assets’, and this includes locally listed buildings.
- 2.56 Heritage ‘significance’ is defined in the NPPF as
- ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting’.*
- 2.57 The Historic England ‘*Historic Environment Good Practice Advice in Planning Note 2*’ puts it slightly differently – as
- ‘the sum of its architectural, historic, artistic or archaeological interest’.*
- 2.58 ‘*Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*’ (English Heritage, 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.
- 2.59 ‘Heritage significance’ and ‘heritage values’ are assumed to be conceptually equivalent to each other, and to the statutory term which is the ‘*special architectural or historic interest*’ of a listed building or a conservation area.
- ‘Historic interest’ or ‘Historical’, ‘Evidential’ or ‘Communal’ value*
- 2.60 The site and its relationship to the surrounding buildings and nearby heritage assets collectively illustrates the development of this part of London. Historical value is described as being illustrative or associative. The story of [the site] illustrates a good deal about how London evolved from [date] to the present day, about the transformation of the original landed estates, and about social change and lifestyles in that period.
- 2.61 In terms of Historic England’s ‘Conservation Principles’ the building provides us with ‘evidence about past human

activity’ and by means of its fabric, design and appearance communicates information about its past.

‘Architectural interest’, ‘artistic interest’ or ‘aesthetic value’

- 2.62 ‘Architectural’ and ‘artistic interest’ (NPPF) or ‘aesthetic value’ (‘Conservation Principles’). In respect of design, ‘Conservation Principles’ says that ‘design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship’.
- 2.63 The architectural and historic significance of this flagship headquarters building by Alfred and Paul Waterhouse for the largest British insurance company of the 19th and 20th centuries is beyond question, and enshrined in its Grade II*listing.
- 2.64 It is also extremely important in construction history terms, its turn-of-the century phases *‘a tour de force of advanced interior steel framing combined with load-bearing brickwork’*.⁵⁷ That constructional virtuosity and experimentation continued through the early 20th century, especially in the reinforced concrete extensions of 1920 by Paul Waterhouse in consultation with Truscon. The (surviving parts) of the 1930-32 block by EM Joseph are also significant, not because of its (by then commonplace) steel frame, but for its adaptation of (or departure from, even) the site’s established ‘house style’ to the architectural needs and expression of its time.
- 2.65 The late 20th century work is perhaps less successful, and brought with it significant loss and transformation to the local historic environment. Architecturally, the chief loss was Greville House. In 1987 *Building* magazine noted that, despite being *‘a fine example of Edwardian baroque style’* that *‘Craftily, it has not been included in Cunningham’s study as it bears no stylistic relation to*

⁵⁷ Jonathan Clarke, *Early Structural Steel in London Buildings: A Discreet Revolution* (English Heritage, 2014), 213

Waterhouse's dominant Gothic style and is separated from the main complex Greville Street.⁵⁸ Other notable losses of historic fabric included '*Waterhouse's relatively utilitarian rear elevation on Greville Street*',⁵⁹ the Brooke Street elevation of Joseph's 1930-32 block (fig. 25⁶⁰), and the 1930s Hardwick House – all exemplifying the Prudential's openness to stylistic plurality following, and indeed overlapping, the Waterhouse era.



Figure 25: Drawing by E.M. Joseph showing the Brooke Street elevation of his extension of 1930-32

- 2.66 The 1989-93 scheme also saw the erasure of a significant stretch of Greville Street, with a concomitant loss to Holborn's historic street pattern and public realm (fig. 6 above).
- 2.67 Such losses were deemed justifiable to Camden Council and English Heritage in the mid/late 1980s because of the perceived planning gains, summarised at the time as:

⁵⁸ 'Prudent Improvement, *Building*, 4 December 1987, 49

⁵⁹ *Ibid.*

⁶⁰ *The Evolution of Holborn Bars, 1879-1993*

- ‘First, the scheme actually improves the craggy icon of Waterhouse’s main Holborn frontage, as it removes an ungainly 1930s block that looms over one side [presumably Joseph’s extension to Brooke Street]
- Second, it provides a small public square at the rear for the stallholders of the bustling Leather Lane street market.
- Third, to compensate for the loss of Greville Street, the Pru has volunteered to donate Waterhouse’s main courtyard as a public space, with passageways threading through the complex from one side to the another. At present the courtyard is blighted by parked director’s cars, but these would go underground and an attractive colonaded cloister erected in their place.
- Fourthly, The Pru’s architects envisage it operating much like courtyards in the neighbouring inns of court, where professionals going about their business rub shoulders with members of the public strolling through’.⁶¹

2.68 On this last point, despite the opening up of the courtyard to the public through the relocation of parking underneath it, and increased access into and across it, success has only proved partial – the ‘existing courtyards [are still] perceived as ‘private’ spaces.’⁶²

2.69 Contemporary comment about the architecture, whilst complimentary regarding the renovation of the historic parts, was more critical of some aspects of the new work. Dale Jennings, then Director of ORMS Architects & Designers noted how *‘EPR has split the .. tapered atrium with a lumpen core, which neither binds nor enhances the*

⁶¹ Ibid

⁶² WHS-ORM-XX-XX-PP-A-30001_WIP210410, 20], 36

space'.⁶³ However he thought *'the quality that the atria brings to the offices is remarkable'*,⁶⁴ concluding that:

*'DEGW's fit-out seems to suit the Prudential image: large, efficient and low-key; hierarchical yet pragmatic; economic. But there is a lack of ambition. Flair takes second place to practicality. The consistency of quality is admirable, and the thoughtful choice of elements is impressive over such a large project.'*⁶⁵

2.70 Colin Amery was more impressed:

*'The other new element of this project is the entrance hall to the speculative offices called No. 2 Waterhouse Square. It has become almost the norm for developers to invest a great deal of time and talent in the design of a huge atrium or hall as an approach to what are essentially mundane serviced office floors. This new atrium is no exception, an almost circular space with a sweeping marble staircase that rises behind a ramped curved marble all. I had the distinct impression I had somehow strayed from the Victorian probity of Waterhouse's Gothic halls to some millionaire's marble folly in Miami. I have to admit, however, that I was fascinated by the centrepiece of this extravaganza which is a sculptural installation of a great granite sphere which is constantly supported on a pad of water under high pressure that allows it to spin freely, despite its enormous weight.'*⁶⁶

2.71 Nonetheless, it was the reanimated vitality of the historic buildings that, in the context of the relative blandness of the new work, most impressed Amery:

'Waterhouse has been much blessed by this redevelopment. His version of the Gothic does not seem a pale imitation of the medieval. It shines out in its new

⁶³ Dale Jennings, 'Appraisal', *Architects' Journal*, 30 March 1994, 45

⁶⁴ *Ibid*

⁶⁵ *Ibid*

⁶⁶ Colin Amery 'The Power of Prudence', *Financial Times*, 11 October 1993, 13

*surroundings as an intelligent, prudent and measured exercise of Victorian civic architecture at its best.*⁶⁷

Conclusion

2.72 The preceding discussion makes clear that the 19th and early 20th century (including inter-war phases) of the Waterhouse Square complex are of significant heritage value. Their special architectural or historic interest is evident, and they possess clear evidential, historical, aesthetic and communal value. That special interest and those heritage values are not present to any comparable degree in the later 20th century work and in 2 Waterhouse Square. These recent phases of intervention in the overall site are relatively mundane and of little interest for their period, they removed earlier built fabric of interest, and they do not integrate well with the surviving earlier listed Waterhouse buildings or the Hatton Garden Conservation Area. No. 2 Waterhouse Square makes, at best, a neutral contribution to the Hatton Garden Conservation Area.

⁶⁷ Ibid

3 The legislative, policy and guidance context

Introduction

- 3.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.2 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act').
- 3.3 Section 16(2) says 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'*
- 3.4 Section 66(1) of the Act says that *'In considering whether to grant planning permission for development which affects a listed building or its setting, the local respects listed 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'*.
- 3.5 Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay *'special attention... to the desirability of preserving or enhancing the character or appearance of that area'*.

The National Planning Policy Framework

- 3.6 The National Planning Policy Framework (NPPF) was first published in 2012 with the most recent update being published on 20 July 2021⁶⁸

Design

- 3.7 Chapter 12 of the National Planning Policy Framework, ‘Achieving well-designed places’, deals with design:. It begins:

‘The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process’ (paragraph 126).’

- 3.8 Paragraph 130 sets out a series of expectations regarding design quality and advises that ‘planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging

⁶⁸ First published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. Ministry of Housing, Communities & Local Government (2021) Revised National Planning Policy Framework. Online: www.gov.uk/guidance/national-planning-policy-framework

appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

Proposals affecting heritage assets

- 3.9 Chapter 16 of the National Planning Policy Framework: 'Conserving and enhancing the historic environment' deals with Heritage Assets describing them as 'an irreplaceable resource' that '*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*' (paragraph 189).⁶⁹
- 3.10 Paragraphs 190-193 discuss the responsibilities of the local authority towards plan making and the historic environment.
- 3.11 Paragraph 194 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says that:

⁶⁹ The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

'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.'

3.12 In terms of the local authority, paragraph 195 requires that they:

'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.'

3.13 Further: *'where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision'* (paragraph 196).

3.14 Paragraph 197 says that *'In determining applications, local planning authorities should take account of:*

a) 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.'

Considering potential impacts

- 3.15 Paragraph 199 advises local planning authorities 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’*
- 3.16 Paragraph 200 continues: *‘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.’*⁷⁰
- 3.17 In terms of proposed development that will lead to substantial harm to (or total loss of significance of) a designated heritage asset, paragraph 201 states that *‘local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total 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; and*

⁷⁰ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

(b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

(c) conservation by grant-funding or some form 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.'

- 3.18 It continues *'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'* (paragraph 202).
- 3.19 In considering the effect of an application on the significance of a non-designated heritage asset the local authority should employ a 'balanced judgement' in regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 203).
- 3.20 Paragraph 204 requires that *'Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred'* (paragraph 204).
- 3.21 Where a heritage asset is to be lost, the developer will be required to *'record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'* (paragraph 205).⁷¹
- 3.22 In terms of development within the setting of heritage assets, paragraph 206, advises that *'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage*

⁷¹ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

sites, and within the setting of heritage assets, to enhance or better reveal their significance. 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’ (paragraph 206).

3.23 It goes on however that *‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage site as a whole’ (paragraph 207).*

3.24 Finally, paragraph 208 requires that the onus will be on local planning authorities to *‘assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies’.*

3.25 The setting of a heritage asset is defined in 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’.⁷²

⁷² <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

Planning Practice Guidance

3.26 Planning Practice Guidance⁷³ provides streamlined guidance for the National Planning Policy Framework and the planning system. The section entitled ‘Conserving and Enhancing the Historic Environment’ gives guidance on matters relating to protecting the historic environment under the following headings:

- Overview: historic environment;
- Plan making: historic environment;
- Decision-taking: historic environment ;
- Designated heritage assets;
- Non-designated heritage assets;
- Heritage Consent Processes and;
- Consultation and notification requirements for heritage related applications.

Historic England Planning Advice⁷⁴

Good Practice Advice

3.27 Historic England publish guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. This provides ‘information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the national Planning Practice Guide (PPG)’.

3.28 These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);

⁷³ Ministry of Housing, Communities & Local Government (2019). Revised National Planning Policy Framework. Online: www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

⁷⁴ Historic England, *The Planning System*, Online: historicengland.org.uk/advice/planning/planning-system

- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017);
- GPA 4: Enabling development and heritage assets (2020).

GPA 3: The Setting of Heritage Assets

- 3.29 This note provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting.
- 3.30 The guidance echoes the definition of ‘setting’ in the NPPF as

‘the surroundings in which [the asset] is experienced’ and continues: ‘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’.

- 3.31 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed scheme on that significance.
- Step 1: identify which heritage assets and their settings are affected;
 - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
 - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
 - Step 4: explore the way to maximise enhancement and avoid or minimise harm;
 - Step 5: make and document the decision and monitor outcomes.

3.32 The document then sets out how the step-by-step methodology is used and considers each step in more detail.

Historic England Advice Notes

3.33 These advice notes covering various planning topics in more detail and at a more practical level. They have been prepared by Historic England following public consultation.

3.34 The documents most relevant to the proposed development are:

- HEAN 1 - Conservation Areas
- HEAN 2 - Making Changes to Heritage Assets
- HEAN 10 - Listed Buildings and Curtilage
- HEAN 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets

Conservation Principles, Policies and Guidance for the sustainable management of the historic environment

3.35 This document⁷⁵ has been referred to in Section 2 of this report. It describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value. The conservation area, listed buildings and locally listed buildings have evident special architectural and historic interest. Any proposals for the site must have regard for the preservation of this special interest.

London Plan

3.36 The new London Plan was adopted on 2 March 2021.⁷⁶ It is the Spatial Development Strategy for Greater London.

⁷⁵ English Heritage (2008) *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*. Online: <https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment>

⁷⁶ Mayor of London/GLA (2021) *London Plan*. Online: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

- 3.37 Chapter 7 ‘Heritage and Culture’ defines ‘Heritage significance’ (para 7.1.7) as:

‘the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset’s visual attributes, such as - form, scale, materials, and architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets.’ It goes on to say that ‘development that affects heritage assets and their settings should respond positively to the assets’ significance, local context and character to protect the contribution that settings make to the assets’ significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form’.

- 3.38 In terms of development proposals, Policy HC1 ‘Heritage conservation and growth’, says 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.”

- 3.39 Policy HC3 deals with ‘Strategic and Local Views’. This policy describes how the Mayor has designated a list of Strategic Views (set out in the Plan) that will be kept under review and requires that ‘development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.’ In order to further protect ‘Strategically-Important Landmarks in the view’ the Mayor will designate ‘landmark viewing corridors and wider

setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.'

3.40 Policy HC4 London View Management Framework. This builds upon Policy HC3 and advises that:

A. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and where possible enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

B. Development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.

C. Development proposals and external illumination of structures in the background of a view should give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well-preserved within its setting with clear sky behind, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a Strategically-Important Landmark should take into account the effects of distance and atmospheric or seasonal changes.

Section D gives further advice on compliance with 'London Panoramas', 'River Prospects' and 'Townscape

and Linear Views'. Section E advises on 'Viewing Places' and F on strategies where there is a 'Protected Vista'.

Detailed guidance is provided in the form of the London View Management Framework - Supplementary Planning Guidance⁷⁷.

Camden Local Plan

3.41 The London Borough of Camden adopted its Local Plan in July 2017. The Plan sets out the Council's planning policies. It replaces Camden's Core Strategy and Development Policies planning documents (adopted in 2010).

3.42 Section 7 of the Plan deals with Design and Heritage saying that 'the Council places great importance on preserving the historic environment'.

3.43 Policy D1 Design says that:

'The Council will seek to secure high quality design in development. The Council will require that development:

a. respects local context and character;

b. preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";

c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

d. is of sustainable and durable construction and adaptable to different activities and land uses;

e. comprises details and materials that are of high quality and complement the local character;

⁷⁷ Mayor of London/GLA (2012) *London View Management Framework - Supplementary Planning Guidance*. Online: www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

g. is inclusive and accessible for all;

h. promotes health;

i. is secure and designed to minimise crime and antisocial behaviour;

j. responds to natural features and preserves gardens and other open space;

k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping;

l. incorporates outdoor amenity space; m. preserves strategic and local views;

n. for housing, provides a high standard of accommodation; and

o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

3.44 Policy D1 also addresses 'Tall Buildings', 'Public Art' and 'Excellence in Design'.

3.45 Policy D2 'Heritage' deals with Camden's heritage assets. The policy says that:

'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.'

3.46 In relation to designated heritage assets generally the policy says:

'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;

c. conservation by grant-funding or some form 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.'

3.47 'The Council will not permit development that results 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'.

3.48 In relation to conservation areas the policy says:

'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. The Council will:

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

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;

g. resist development outside of a conservation 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.'

3.49 In relation to listed buildings the policy says:

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

i. resist the total or substantial demolition of a listed building;

j. 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

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

3.50 In relation to other heritage assets and non-designated heritage assets including those on and off the local list, Registered Parks and Gardens and London Squares the policy states:

'The effect of a proposal on the significance of a non-designated 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.'

Camden Planning Guidance: Design

3.51 Updated guidance (CPG) relating to 'Design' was published in January 2021.

3.52 In regard to heritage matters, this sets out that:

'The Council - will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset/s affected.' The Council will take account of:

- *The desirability of sustaining and enhancing the significance of any heritage asset/s and putting them to viable uses consistent with their conservation;*
- *The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing;*
- *The desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness.*

Applicants - will need to show how the significance of a heritage asset, including any contribution made by their setting, has been taken into consideration in the design of the proposed works. The level of detail required will be proportionate to the asset/s importance and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset/s affected.'

4 The proposed development and its effect

Introduction

- 4.1 This section of the report describes the proposed scheme in terms of its effect on the heritage significance of the site and its context, described and analysed earlier in this report.
- 4.2 The proposed scheme is described in the drawings and Design & Access Statement by Orms Architects submitted with the application, and in other submission documents.
- 4.3 Pre-application advice was sought from the London Borough of Camden in respect of the proposals and the ongoing evolution of the design in response to this advice is detailed in the Design & Access Statement. The scheme has been altered and developed in response to pre-application discussions. The scheme has also been reviewed by Camden's Design Review Panel, and amended accordingly.

The proposed scheme

- 4.4 The heritage and townscape significance of the Waterhouse Square complex derives principally from its association with the Waterhouse family and the architectural legacy that the site now contains. The alterations and redevelopment at the site made in the 1980s and 1990s are a useful illustration of how development involving the loss of historic buildings and urban grain that was considered acceptable then seems inappropriate now, notwithstanding the views of Camden and English Heritage (as was) at the time. Also, while the restoration and retention of some of the Waterhouse/Joseph work was commendable, the design of the new development, to the north and west of the site, is remarkably clumsy. While significant interest in and designation of post-Modern buildings from the period has occurred in recent years, the new work of the 80s and 90s at Waterhouse merely represents a plodding and

unintelligent copying of a style that was better implemented elsewhere. These recent parts of the site now look dated and awkward, and sit uncomfortably alongside the older buildings of high heritage significance.

- 4.5 The Prudential Assurance Company Limited has an ambition to develop a phased masterplan for the whole Waterhouse Square site, re-imagining and re-purposing for its long term future. The first phase proposed is for 2 Waterhouse Square.
- 4.6 The masterplan approach represents an opportunity to rectify the shortcomings of the overall site in practical and heritage terms. As well as offering the potential for architectural enhancement, the masterplan suggests a way of integrating what is a large urban block back into the surrounding city. The site is not really permeable – the routes through it do not feel public and the uses on the site are essentially non-public. Reanimating the site with a wider range of uses, as envisioned in the masterplan, will, together with greater permeability, draw more people into the heart of the site and within its buildings, thus offering the opportunity to more people to appreciate the heritage significance of the Waterhouse buildings. The possible uses and associated physical interventions create the opportunity to better reveal that significance.
- 4.7 The proposals for 2 Waterhouse Square would commence this positive process, and offer immediate heritage, architectural and urban design benefits. It would restore a sense of the historic line of Greville Street, and reinstate the historic building line on Leather Lane as well as the route through from Brooke's Market. It would enhance the legibility of the Waterhouse portion of the site by creating a clear separation with , by mean of the established line of Greville Street and the inset entrances. It would improve the view from the courtyard to the south. It would reinstate a historic courtyard. It would preserve in 2 Waterhouse Square the parts of the listed building that contribute to its special interest.

- 4.8 The proposal represents a considerably more sympathetic response to the highly significant core elements of the overall site than the existing No. 2 Waterhouse Square. In contrast to the date and generic elevational design and materiality of the existing building, the proposal draws from the architectural character and appearance of the Waterhouse work for its expression, and in doing so is both respectful and deferential, but also concerted in its architectural expression - it is subservient without being bland. It echoes the massing and design of the older buildings on the site but does not seek to imitate or stridently contrast. The design achieves an appropriate balance between architectural integrity and 'knowing its place' in relation to the overall Grade II* complex and the conservation area.
- 4.9 The point being made in the commentary above is illustrated in depth in the Design & Access Statement. Section 4 of the Design & Access Statement explains how the massing of the proposed scheme echoes the extended mansards found elsewhere on the overall site, explains the vertical hierarchy of the facades and shows how the fenestration is set out in a legible and familiar grid that resonates with the traditional façades of the other Waterhouse buildings.
- 4.10 Section 5 of the Design & Access Statement shows how, based on the analysis of heritage significance that has informed the proposed scheme, areas of specific surviving heritage significance in No. 2 Waterhouse Square are sensitively adapted to work with the overall proposal. The three internal 'heritage areas' in question (R6 - office space and existing entrance, R7 - office space and plant at lower ground floor, and R11 -office space and BOH/Plant at ground and lower ground floor) are approached in a pragmatic manner that seeks to reverse inappropriate work (such as poor quality secondary glazing and avoiding window head clashes), refurbishing the attractive and valuable Stairs 9 and 10 along with surviving doors. The entrance area is similarly addressed.

- 4.11 Externally, some new openings are proposed in historic fabric, but these are designed to replicate the architectural vocabulary of the host building.
- 4.12 Works to create a new atrium from the two existing atria, and thus to recreate a historic courtyard, will also allow the historic fabric facing the courtyard to be more legible and better appreciated than is presently possible.
- 4.13 Finally we note from the Design & Access Statement that the proposed development will lie beneath the threshold planes of any LVMF view, and thus the development will not affect those views.

Summary and conclusion: the effect on heritage significance

- 4.14 In summary, that which is important in heritage terms, and which survives in No. 2 Waterhouse Square, is protected, repaired and successfully integrated into the proposed scheme. The overall proposal replaces the generic building at No. 2 Waterhouse Square, which has no meaningful relationship with the heritage of the site, with a building that refers to and is deferential to the overall Grade II* listed complex. In addition, the proposed scheme responds far more positively to the Hatton Garden Conservation Area than the existing building, both spatially and in terms of elevational design and active frontages. For example, the development will clearly enhance the background of the conservation area's Key View 1 looking west along Greville Street and the setting of the landmark identified in that view, 88-90 Hatton Garden.
- 4.15 The analysis that we have undertaken and which is set out above leads us to conclude that the proposed scheme for No.2 Waterhouse Square will preserve the special architectural or historic interest of the Grade II* Waterhouse buildings, the setting of nearby listed buildings (notably the Grade II St Alban's Clergy House and the Grade II* St Alban's Church), and the character and appearance of the Hatton Garden Conservation Area.

- 4.16 We consider that the proposed scheme will not just preserve the heritage significance and special architectural or historic interest of designated heritage assets, but positively enhance heritage significance and special interest over their present circumstances, for the reasons given in this section of the report. We also conclude that the local heritage significance of non-designated heritage assets is preserved and enhanced.
- 4.17 For the same reasons we do not consider that harm to heritage significance is caused by the proposed scheme. This point is discussed further in the next section of the report. On the basis that our assessment of the effect of the proposed scheme on the listed Waterhouse Square concludes that there is no harm to that building, it is not considered necessary to the effect of the proposed scheme on the surrounding designated and non-designated heritage assets in detail, as they too will experience no harm from the proposed development and the settings of those assets will be preserved.
- 4.18 The Design & Access Statement includes a series of townscape views, and these views are accompanied by further commentary on the proposed scheme prepared by KMHeritage.

5 Compliance with legislation, policy and guidance

Introduction

- 5.1 This report has provided a detailed description and analysis of the heritage significance of the site and its context, and has described how the proposed scheme would affect that heritage significance.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed works preserve and enhance the special architectural and historic interest of Waterhouse Square, the setting of nearby listed buildings that possess intervisibility with the site (and the setting of other listed buildings without intervisibility, by virtue of having no effect) and the character and appearance of the Hatton Garden Conservation Area. The proposed development thus complies with Sections 16, 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 5.3 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another [1992] 1 ALL ER 573* and is met if the proposed development leaves conservation areas unharmed. We believe that it would be difficult to characterise the proposed scheme as doing anything less than leaving the Hatton Garden Conservation Area unharmed. It very clearly enhances the conservation area over its present situation.
- 5.4 To be clear, our assessment is that the development goes beyond mere preservation and will enhance the character and appearance of the Hatton Garden Conservation Area and the setting of heritage assets.

The National Planning Policy Framework

Design

- 5.5 The proposed scheme would be wholly consistent with Chapter 12 of the NPPF 'Achieving well-designed places'. It is a good example of a design which 'will function well and add to the overall quality of the area' and be 'sympathetic to local character and history, including the surrounding built environment while not preventing or discouraging appropriate innovation or change (such as increased densities);' as sought by Paragraph 130 of the NPPF. It will 'establish or maintain a strong sense of place' and 'optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development'.

The level and nature of 'harm' caused by the proposed development

- 5.6 Having concluded that the proposal will preserve and enhance the relevant designated heritage assets, we now consider whether harm – in the sense used by the National Planning Policy Framework – is caused to these heritage assets.
- 5.7 As outlined in Section 3, the NPPF identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm (or total loss of significance)' or 'less than substantial' harm. Both levels of harm must be caused to a *designated* heritage asset – in this instance the Grade II* listed Waterhouse Square complex, the Hatton Garden Conservation Area and nearby listed buildings. Harm to non-designated heritage assets is not allocated a level.
- 5.8 The only potential for 'substantial harm' (Paragraph 201 of the NPPF) would be if the proposed development for the site caused the loss of something *central* to the special interest of these heritage assets. The proposal evidently does not give rise to this level of harm.

5.9 Similarly, we also do not believe that any ‘less than substantial harm’ (Paragraph 202 of the NPPF) to listed buildings and conservation areas is caused by the scheme. Our analysis of the proposed development, provided earlier in this report, when considered in relation to legislation, policy and guidance, concludes that no harm is caused to special interest or significance. Change occurs to and in the character and appearance or the setting of designated heritage assets, but this change will preserve and enhance the special architectural or historic interest of the Waterhouse Square complex, the setting of nearby listed buildings and the character and appearance of the Hatton Garden Conservation Area.

Specific requirements of the NPPF in respect of heritage assets

5.10 This report has referred to and used a detailed description and analysis of the significance of the site and its heritage context, as required by Paragraph 194 of the National Planning Policy Framework.

5.11 The proposed development complies with Paragraph 199 of the NPPF in that it conserves the heritage assets affected. Special architectural or historic interest is preserved and enhanced, and no harm to heritage significance is caused. Paragraphs 200, 201 and 202 of the National Planning Policy Framework are therefore not engaged in consideration of the proposed works. Paragraph 203 is not relevant in this instance.

5.12 The proposed development is a good example of what is sought by Paragraph 206 of the NPPF: it represents a ‘new development within Conservation Areas ...and within the setting of heritage assets [which will] enhance or better reveal their significance’ and will ‘preserve those elements of the setting that make a positive contribution to the asset’.

5.13 In summary, the proposed works very definitely strike the balance suggested by the NPPF – they intervene in the relevant designated heritage assets in a manner

commensurate to their special interest and heritage significance. This balance of intervention versus significance is described in detail earlier.

Historic England guidance on the setting of heritage assets

5.14 In completing our assessment, we have followed the step-by-step methodology provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3 which is addressed as follows:

- Step 1: identify which heritage assets and their settings are affected:

This is done in Section 2 of this report.

- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated:

This is discussed in Section 2.

- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or the ability to appreciate it:

This is undertaken in Section 4 of this report.

- Step 4: explore the way to maximise enhancement and avoid or minimise harm:

This formed part of the design process and pre-application discussions with the local planning authority, and the design has evolved to respond to pre-application advice.

- Step 5: make and document the decision and monitor outcomes:

The submission documents, in particular the Design & Access Statement, and this report record the scheme as amended following design development prior to and during an application for planning permission being made.

The London Plan

- 5.15 The proposed scheme would be consistent with the London Plan and fully complies with its Design (Chapter 3) and Heritage (Chapter 7) policies.
- 5.16 The proposed scheme will be of the highest architectural quality and responds to Policy D3 *‘Optimising site capacity through the design-led approach’* by *‘positively responding to local distinctiveness and successfully responding to the existing character of the place and in that respects, enhances and utilises the heritage assets and architectural features that contribute towards the local character.’*
- 5.17 It would also be consistent with Policy HC1 ‘Heritage Conservation and Growth’ in that the applicants have sought to identify, understand and conserve the historic environment and the proposals clearly conserve the significance of heritage assets, and their settings, by being *‘sympathetic to their significance and appreciation within their surroundings’*.

Camden Local Plan

- 5.18 The proposal fully respects and comply with the LB Camden’s’ policies in relation to Design (D1) and Heritage (D2). The development is a high quality design that respects local context and character and will preserve and enhance the character and appearance of the Hatton Garden Conservation Area.
- 5.19 This report has shown how the significance of heritage assets, including any contribution made to their setting, has been taken into consideration in the design of the proposed works thus satisfying Camden’s Planning Guidance in relation to Design.

6 Summary and conclusion

- 6.1 After an Introduction, this report, at Section 2, sets out a brief history of the site and its context, identifies the heritage assets, and assesses heritage significance. Section 3 identifies the legislative, policy and guidance context for the development. The proposed scheme and its heritage effects are assessed in Section 4.
- 6.2 The conclusion of our assessment is that what is important in heritage terms, and which survives in No. 2 Waterhouse Square, is protected, repaired and successfully integrated into the proposed scheme. The overall proposal replaces the generic building at No. 2 Waterhouse Square, which has no meaningful relationship with the heritage of the site, with a building that refers to and is deferential to the overall Grade II* listed complex. In addition, the proposed scheme responds far more positively to the Hatton Garden Conservation Area than the existing building, both spatially and in terms of elevational design and active frontages.
- 6.3 The analysis that we have undertaken and which is set out above leads us to conclude that the proposed scheme for No.2 Waterhouse Square will preserve the special architectural or historic interest of the Grade II* Waterhouse buildings, the setting of nearby listed buildings (notably the Grade II St Alban's Clergy House and the Grade II* St Alban's Church), and the character and appearance of the Hatton Garden Conservation Area.
- 6.4 We consider that the proposed scheme will not just preserve heritage significance and special architectural or historic interest, but positively enhance heritage significance and special interest over their present circumstances, for the reasons given in this section of the report.
- 6.5 Section 5 demonstrates how the proposed development will comply with legislative, policy and guidance. We

believe that the development will preserve and enhance the special architectural or historic interest of designated heritage assets (either directly, in the case of the Grade II* listed Waterhouse Square complex and the Hatton Garden Conservation Area, indirectly on the setting of nearby listed buildings, or by not having any effect), and it therefore complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It also preserves and enhances the setting of non-designated heritage assets (nearby locally listed buildings). The proposed scheme is consistent with the design and heritage policies of the National Planning Policy Framework, the London Plan and Camden's Local Plan.

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