

# Built Heritage Statement

## Rosa's Thai, 26 Earlham Street, Seven Dials, London WC2H 9LN

On behalf of Rosa's London Limited

Date: November 2023 | Pegasus Ref: P23-2203





## Document Management.

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## Contents.

1. Introduction.....	4
2. Proposed Development.....	5
3. Site Description and Planning History.....	7
4. Methodology.....	10
5. Policy Framework.....	12
6. The Historic Environment.....	13
7. Assessment of Impacts.....	21
8. Conclusions.....	25

## Appendices contents.

Appendix 1: Assessment Methodology.....	26
Appendix 2: Legislative Framework.....	33
Appendix 3: National Policy Guidance.....	35
Appendix 4: Relevant Development Plan Policies.....	42
Appendix 5: Full List Entry.....	47

## Plates:

Plate 1: Site Location Plan.....	4
Plate 2: 26 Earlham Street, front (north) elevation.....	7
Plate 3: 1892–1914 Ordnance Survey Map.....	8
Plate 4: 1944–1972 Ordnance Survey Map.....	8

Plate 5: 24 and 26 Earlham Street in 1974. Source: London Metropolitan Archives. (Source: The Seven Dials Trust, <a href="http://www.sevendialscoventgarden.study">www.sevendialscoventgarden.study</a> ).....	9
Plate 6: 24 and 26 Earlham Street, front elevation.....	14
Plate 7: No. 26 Earlham Street shopfront (the site).....	15
Plate 8: Timber-framed windows at the first floor, featuring modern restaurant fit-out and décor.....	16
Plate 9: Timber-framed window and bay at the second floor, including original shutters.....	16
Plate 10: Historic staircase with modern coverings.....	17
Plate 11: Timber panel partition on second floor.....	17
Plate 12: Historic staircase leading up to the third floor.....	18



# 1. Introduction

1.1. Pegasus Group have been commissioned by Rosa's London Limited to prepare a Built Heritage Statement to consider the proposed internal and external alterations at 26 Earlham Street, London, as shown on the Site Location Plan provided at Plate 1.

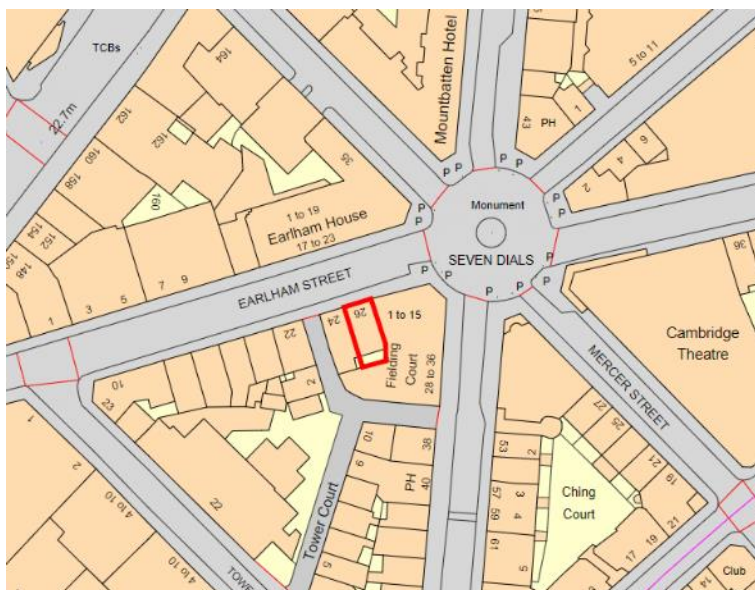


Plate 1: Site Location Plan.

1.2. The application site comprises a single restaurant unit, which forms part of the wider Grade II Listed 24 and 26 Earlham Street. The site also falls within the designated bounds of the Seven Dials (Covent Garden) Conservation Area.

1.3. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 194 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

***"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".<sup>1</sup>***

1.4. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 199 to 203 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

1.5. As required by paragraph 194 of the *NPPF*, the detail and assessment in this Report is considered to be *"proportionate to the assets' importance".<sup>2</sup>*

<sup>1</sup> Department for Levelling Up, Housing and Communities (DLUHC), *National Planning Policy Framework (NPPF)* (London, September 2023), para. 194.

<sup>2</sup> DLUHC, *NPPF*, para. 194.

## 2. Proposed Development

2.1. The application seeks Listed Building Consent and Advertisement Consent for the external and internal alterations at the Rosa's Thai at 26 Earham Street.

2.2. The full schedule of works is as follows:

### External

- Removal of existing spotlights and painted lettering;
- Installation of new externally illuminated individual halo letter fascia sign;
- Installation of new hanging sign on existing bracket;
- Application of painted white lettering below fascia sign; and
- Repainting of shopfront.

### Ground Floor

- Installation of hanging 'ROSA' pendant lights in shopwindow;
- Installation of internally-illuminated menu box in shopwindow;
- Reupholster the existing banquette seating;
- Update paint finishes to the walls, ceilings, banquette seating and window frames;
- Installation of new tiled finish at the back of the bar;

- Installation of new doily wall lights;
- Application of Thai graphic on existing mirror and textured wall panels; and
- Installation of new half-screen between banquette seating.

### First Floor

- Update paint finishes to the walls, ceilings, banquette seating and window frames;
- Reupholster the existing banquette seating;
- Installation of new doily wall lights and pendent lighting; and
- Installation of neon wall sign and other décor throughout the space.

### Second Floor

- Update paint finishes to the walls and window frames;
- Installation of new faux reeded glass timber screening with low level wall panelling;
- Installation of new pendant lighting;
- Reupholster the existing banquette seating; and



- Installation of new décor, including lightboxes and graphics to the walls and ceiling.

2.3. **Section 7** of this Report presents an analysis of the impact of the proposed development on identified heritage assets discussed in **Section 6**

### 3. Site Description and Planning History

#### Site Description

- 3.1. The application site comprises a four-storey, terraced Georgian townhouse, with associated basement floorspace. The building is currently occupied by Rosa's Thai, who have operated in the premises since c.2017. The restaurant operates across all floors, with dining space at the ground, first and second floors; kitchen at the basement; and office/storage space at the third floor.
- 3.2. The restaurant fronts Earlham Street to the north, comprising a 20<sup>th</sup>-century shopfront featuring a recessed entrance, two timber-framed four-pane sash windows, a fascia and stallriser. The existing advertising scheme for the restaurant includes vinyl print lettering with individual spotlights on the fascia, a branded awning, internal menu box and a metal bracketed hanging sign.
- 3.3. The upper floors are made up of a white-painted brick exterior with architrave sash windows and a mansard roof with dormers. The internal fit-out comprises the modern restaurant elements and décor associated with the current occupant of the site. This has left very little historic fabric or appreciation of the historic plan form.
- 3.4. The wider streetscene is made up of a mixture of historic and modern development, mainly with commercial at ground floor level and residential above.



Plate 2: 26 Earlham Street, front (north) elevation.



### Site Development / Map Regression

- 3.5. The application building was built during the early-19<sup>th</sup> century as part of a wider row of late-Georgian re-development in the Seven Dials area. Historic mapping and aerial imagery show that there has been very little change to the footprint of the site since the late-19<sup>th</sup> century.
- 3.6. Within the wider area, a group of buildings adjacent to the site and at the junction of the Seven Dials was demolished during the early-20<sup>th</sup> century. This site remained vacant until a petrol station was built in the 1950s and then subsequently redeveloped into a five-six-storey block of flats in the 1970s. This survives today and can be seen in modern satellite imagery.



Plate 3: 1892-1914 Ordnance Survey Map.

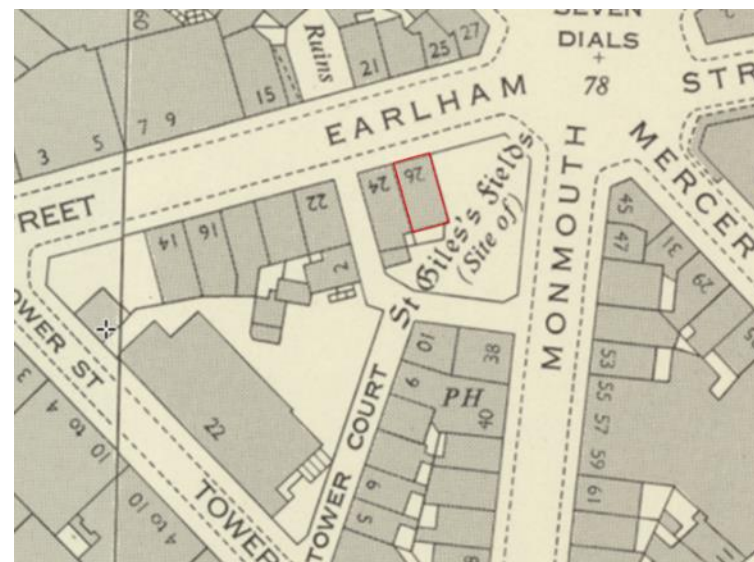


Plate 4: 1944-1972 Ordnance Survey Map.

- 3.7. It is understood that the site has been in use as a restaurant and takeaway from at least the mid-20<sup>th</sup> century. Historic planning applications and photographs of the building from the 1970s illustrate this. The only notable features surviving from the earlier shopfront are the timber consoles to the sides.



Plate 5: 24 and 26 Earlam Street in 1974. Source: London Metropolitan Archives. (Source: The Seven Dials Trust, [www.sevendialsoverground.study](http://www.sevendialsoverground.study))

### Planning History

3.8. A review of recent planning history records held online by Camden Council, has revealed several applications for the site, those of relevance are as follows:

- **Ref. 2016/6709/L** | Installation of a new shopfront and associated signage; internal alterations to include the strip out all modern partitions, joinery, modern metal staircases, wall and floor finishes throughout, reinstating the original timber staircase from basement to the first floor level, new stud walls to approximate original location to perimeter of staircase, modern light weight partitions to form WC enclosures and repair the fabric of the original and existing staircase. | Granted March 2017.
- **Ref. 2016/6779/P** | Installation of a new shopfront to restaurant (Class A3). | Granted March 2017.
- **Ref. 2017/0897/A** | Display of externally illuminated fascia sign and a non-illuminated awning. | Granted March 2017.
- **Ref. 2019/1440/L** | External alterations in connection with the installation of replacement plant and attenuation of the flat roof at first floor level withing the enclosed rear lightwell. | Granted May 2019.

## 4. Methodology

4.1. The aims of this Report are to assess the significance of the heritage resource within the site/study area, to assess any contribution that the site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

4.2. This assessment considers built heritage.

### Sources

4.3. The following key sources have been consulted as part of this assessment:

- The National Heritage List for England for information on designated heritage assets;
- Historic maps available online;
- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
- Google Earth satellite imagery; and
- Seven Dials Conservation Area Statement.

### Site Visit

4.4. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 13<sup>th</sup> October 2023, during which the site and its surrounds were assessed.

### Photographs

4.5. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals, nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

### Assessment Methodology

4.6. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 1**. However, for clarity, this methodology has been informed by the following:

- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-*

*Taking in the Historic Environment* (hereafter GPA:2);<sup>3</sup>

- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter GPA:3);<sup>4</sup>
- *Historic England Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management* (hereafter HEAN:1).<sup>5</sup>
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter HEAN:12);<sup>6</sup> and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.<sup>7</sup>

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<sup>3</sup> Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (GPA:2) (2<sup>nd</sup> edition, Swindon, July 2015).

<sup>4</sup> Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets* (GPA:3) (2<sup>nd</sup> edition, Swindon, December 2017).

<sup>5</sup> Historic England, *Historic England Advice Note 1 – Conservation Area Appraisal, Designation and Management* (HEAN:1) (2<sup>nd</sup> edition, Swindon, February 2019).

<sup>6</sup> Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (HEAN:12) (Swindon, October 2019).

<sup>7</sup> English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

## 5. Policy Framework

### Legislation

- 5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.<sup>8</sup>
- 5.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.<sup>9</sup>
- 5.3. Full details of the relevant legislation are provided in **Appendix 2**.

### National Planning Policy Guidance

- 5.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework (NPPF)*,

an updated version of which was published in September 2023. The *NPPF* is also supplemented by the national *Planning Policy Guidance (PPG)* which comprises a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.<sup>10</sup> The *PPG* also contains the *National Design Guide*.<sup>11</sup>

- 5.5. Full details of the relevant national policy guidance is provided within **Appendix 3**.

### The Development Plan

- 5.6. Applications for Listed Building Consent and Advertisement Consent are currently considered against the policy and guidance set out within Camden Council Local Plan (adopted July 2017) and The London Plan (adopted March 2021).
- 5.7. Details of the policy specific relevant to the application proposals are provided within **Appendix 4**.

<sup>8</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

<sup>9</sup> UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

<sup>10</sup> Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23<sup>rd</sup> July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

<sup>11</sup> Department for Levelling Up, Housing and Communities (DLUHC), *National Design Guide* (London, January 2021).



## 6. The Historic Environment

- 6.1. The following Section provides an assessment of elements of the historic environment that have the potential to be impacted upon by the proposed development.
- 6.2. As set out in **Section 1**, the site comprises the Grade II Listed 24 and 26 Earlham Street, which lies within the Seven Dials Conservation Area.
- 6.3. With regards to other heritage assets within the surrounds of the site, Step 1 of the methodology recommended by *GPA3* (see methodology), is to identify which heritage assets might be affected by a proposed development.<sup>12</sup>
- 6.4. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.
- 6.5. It is however widely accepted (paragraph 207 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.<sup>13</sup> In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.
- 6.6. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.
- 6.7. Consideration, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the site as part of their setting, whether the site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.
- 6.8. It has been observed that the following heritage assets have the potential to be sensitive to the development proposals and thus these have been taken forward for further assessment below:
- Grade II Listed 24 and 26 Earlham Street; and
  - Seven Dials Conservation Area.
- 6.9. With regard to other heritage assets in the vicinity of the site, assessment has concluded that the site does not form any part of setting that positively contributes to overall heritage significance due the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, the proposed development is not anticipated to result in a change that would impact upon the overall heritage significance of

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<sup>12</sup> Historic England, *GPA:3*, p. 4.

<sup>13</sup> DLUHC, *NPPF*, para. 207.

these assets. Other heritage assets have therefore been excluded from further assessment within this Report.

### 24 and 26 Earlham Street

- 6.10. Nos. 24 and 26 Earlham Street were added to the National List under a single entry at Grade II on 15<sup>th</sup> January 1973 (NHLE 1342093). The List Entry describes the buildings as follows:

*"Terraced houses with shops. Early C19, altered mid C19. Multi-coloured stock brick; No.26 painted. Slate mansard roof with dormers. 3 storeys. 2 windows each: No.24 with 4-window return, blank windows alternating. C20 shopfronts. Architraved sash windows with 1st floor console bracketed cornice. No.24 with stucco cornice inscribed "R PORTWINE". Original lead rainwater head. INTERIORS: not inspected."*

- 6.11. A full copy of the List Entry is included at **Appendix 5**.
- 6.12. The Listed Building was built during the early-19<sup>th</sup> century as part of a wider row of late-Georgian re-development in the Seven Dials area. The upper floors of the buildings are reflective of the asset's earlier appearance, maintaining original window arrangements, styles and detailed surrounds. Consistent appearances such as this illustrate how the two properties were built as part of the same phase of development. This has been slightly diminished by modern alterations such as painting the original brick façade and removal of the stucco cornice at no. 26.
- 6.13. Both buildings comprise contemporary shopfronts which since the 20<sup>th</sup> century have experienced significant alteration. Despite this, the shopfronts have maintained

traditional shopfront elements, and there remain instances of historic fabric, including the timber consoles at no. 26 (the application site).



Plate 6: 24 and 26 Earlham Street, front elevation.



Plate 7: No. 26 Earlham Street shopfront (the site).

### Statement of Significance

- 6.14. The Grade II Listing of the building highlights it is a heritage asset of the less than the highest significance as defined by the *NPPF*. This significance is consolidated by its inclusion within the boundaries of the Seven Dials Conservation Area.
- 6.15. The heritage significance of 24 and 26 Earlham Street is principally embodied in the two buildings' remaining physical fabric which derives historic and architectural interest as a surviving example of early-19<sup>th</sup>-century redevelopment in the Seven Dials area. This is most evident in the buildings' upper-storied facades which remain relatively consistent in their historic appearance.

- 6.16. Modern shopfront installations for both properties have removed a large extent of appreciable historic fabric at this level; however, some earlier shopfront features have still survived, and whilst much of the fabric is modern, its design and appearance is sympathetic to the traditional appearance of the Listed Building and wider streetscene.
- 6.17. Both units have experienced multiple occupants and uses which has resulted in a significant loss of historic fabric within the interior of the two buildings. Within the application building, the interior mainly comprises the modern restaurant fit-out and décor as approved in 2016, which derives no historic or architectural interest. Historic building fabric is limited to a small number of features, including the timber window mouldings at the first and second floor, the staircases between the first and third floor, and a timber panelled partition on the second floor.
- 6.18. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "setting") which are considered to contribute to its heritage significance comprise:
- The wider historic urban townscape of Earlham Street and the Seven Dials junction, specifically contemporaneous buildings; and
  - The narrow alleys of Tower Court which enclose the Listed Building and illustrate the tight historic urban grain of the immediate surrounds.



*Plate 8: Timber-framed windows at the first floor, featuring modern restaurant fit-out and décor.*



*Plate 9: Timber-framed window and bay at the second floor, including original shutters.*





*Plate 10: Historic staircase with modern coverings.*



*Plate 11: Timber panel partition on second floor.*





Plate 12: Historic staircase leading up to the third floor.

### Seven Dials Conservation Area

- 6.19. The Seven Dials Conservation Area was first designated on 26<sup>th</sup> November 1971 and extended in July 1974, June 1991 and July 1998. A Conservation Area Character Statement has been adopted by Camden Council and helps form the basis of this assessment.
- 6.20. The Conservation Area is sectioned into three areas: Sub-area 1 'Seven Dials', Sub-area 2 'Great Queen Street' and Sub-area 3 'Macklin Street'. The application site falls within the 'Seven Dials' sub-area.
- 6.21. The Conservation Area is characterised by the variation of building types and street layouts which are reflective of the multi-period development in the area. In what is a tightly contained streetscape, changes of road width, building form and land use elevate these character variations and appearances.
- 6.22. The Seven Dials sub-area comprises a mix of commercial and residential space centred around the star-shaped layout which was designed by Thomas Neale in the late 17<sup>th</sup> century. The area was initially a residential space and over time the ground floors became commercial units. Originally, a Doric column with mounted sundials occupied the central round space of Seven Dials, however this was removed in 1773. A replica was erected in the late 20<sup>th</sup> century by the Seven Dials Monument Charity.
- 6.23. During the 18<sup>th</sup> and 19<sup>th</sup> century, there was a rise and expansion of the brewery industry in and around Seven Dials. This saw many of the original Thomas Neale houses being demolished and replaced with large stock brick

warehouses, most of which still survive despite the industry being absent from the area for over 80 years.

- 6.24. In the Victorian era, the area was a slum, and towards the end of the 19<sup>th</sup> century slum clearance began and the creation of Shaftesbury Avenue occurred. The widening of Monmouth Street and the development of theatres in the 20<sup>th</sup> century again altered the character of Seven Dials.
- 6.25. Building heights across the Conservation Area vary greatly and are generally found to be between three and six storeys. This variation is further reflected in the choice of building materials, which comprise a mix of brick (London stock and red), stucco, stone, and timber for shopfronts.
- 6.26. Several key views within the Conservation Area have been identified in the character statement. Those within the Seven Dials sub area include the following:
- Views towards and from Seven Dials;
  - The views towards the open space at the northern end of Neal Street;
  - Views towards the open space at the corner of Neal Street, Earlham Street and Shelton Street;
  - Views along Shaftesbury Avenue towards Cambridge Circus and Princes Circus;
  - Views into Neal’s Yard.

#### Statement of Significance

- 6.27. The significance of the Seven Dials Conservation Area is therefore principally derived from those elements of its intrinsic character and appearance that reflect its historic development. These comprise aspects of its historic layout and street patterns, historic built form and varied development, all of which contribute to the combined historic and architectural, artistic and archaeological interest of the Conservation Area. Most of these interests can be better appreciated as part of key views within and towards the designation area.
- 6.28. While there is currently no statutory protection for the settings of Conservation Areas, it is evident that elements of the surrounds of the Conservation Area make some contribution to its significance, albeit less than the structures and spaces within its boundaries. Principal elements of the physical surrounds and experience of the asset (its setting) which are considered to contribute to its heritage significance comprise the immediate historic urban townscape which frame the designated area, including Covent Garden to the south.

#### The contribution of the site

- 6.29. The Grade II Listed 24 and 26 Earlham Street makes a positive contribution to the character and appearance and therefore overall heritage significance of the Conservation Area. This is mainly due to the two properties forming part of a small group of surviving 19<sup>th</sup>-century terraced development along Earlham Street, and because of their consistent styles which reflect a specific phase of development in the area.

- 6.30. The special interests of the site have been partially diminished through the removal of features such as the roofline cornice. Whilst the ground floor shopfront is a modern addition, it is well designed and incorporates traditional shopfront standards and is another reflection of the multi-period development of the Conservation Area.

## 7. Assessment of Impacts

- 7.1. This Section addresses the heritage planning issues that warrant consideration in the determination of the application for Listed Building Consent and Advertisement Consent in line with the proposals set out within **Section 3** of this Report.
- 7.2. As detailed above, legislation requires that applications for Listed Building Consent and Advertisement Consent are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.
- 7.3. The statutory requirement set out in Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* confirms that special regard should be given to the preservation of the special historic and architectural interest of Listed Buildings and their settings. Section 72(1) of the Act confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the asset, as well as the protection of the character and appearance of a Conservation Area.
- 7.4. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Listed Buildings and Conservation Areas, and this needs to be

the primary consideration when determining the acceptability of the proposals.

- 7.5. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "*substantial harm*" or "*less than substantial harm*" to the identified designated heritage assets, in the context of paragraphs 201 and 202 of the *NPPF*.<sup>14</sup> With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 203 of the *NPPF*.<sup>15</sup>
- 7.6. The *PPG* clarifies that within each category of harm ("*less than substantial*" or "*substantial*"), the extent of the harm may vary and should be clearly articulated.<sup>16</sup>
- 7.7. The guidance set out within the *PPG* also clarifies that "*substantial harm*" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.<sup>17</sup> In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

<sup>14</sup> DLUHC, *NPPF*, paras. 201 and 202.

<sup>15</sup> DLUHC, *NPPF*, para. 203.

<sup>16</sup> DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

<sup>17</sup> DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

***"...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."*<sup>18</sup>**

7.8. This Section will consider each of the heritage assets detailed above and assess the impact of the proposed development, whether that be harmful or beneficial to the significance identified above.

**24 and 26 Earlham Street**

7.9. Alterations to the exterior of the building principally relate to the advertisement scheme and general maintenance of the shopfront; these changes include:

- The removal of the existing spotlights, painted lettering and hanging sign (retaining bracket);
- The installation of new externally illuminated halo individual letter fascia sign;
- The installation of a new hanging sign;
- The painting of white lettering below fascia sign; and
- Repainting of shopfront.

7.10. Physical alterations resulting from the above works include the removal of the existing fixed spotlights and the fixing of the new individual letter fascia sign. The existing timber fascia appears to have formed part of the most recent shopfront alterations, and as such derives no historic and architectural interest. Physical alterations to

this area of the building are thus not expected to have any negative impact to the historic fabric of the Listed Building.

7.11. The existing hanging sign is another addition which formed part of the most recent shopfront alterations. The proposals seek to replace the sign with one with dimensions like-for-like and new branding. The sign will reuse the existing bracket. The proposed will have no impact to the historic fabric or appearance of the building.

7.12. With respect to views of the above features, they have been proposed to allow for better visibility of the retail unit from within the wider streetscene along Earlham Street. The proposed signage, including the painted lettering, will be appropriately sized so to not obscure any features of note, nor affect the appreciation of the frontage as a whole. The halo illumination around the edge of the lettering ensures no additional light fixtures are required, and so the fascia remains clean and uncluttered. Similar methods of illumination and signage have already been implemented on the neighbouring shopfront of no. 24, and so the proposed will not seem out of place across the Listed Building nor the wider streetscene. The repainting of the shopfront will revitalise its appearance as well as enhance the overall presence of the retail unit and Listed Building. The proposed paint colour is considered to be appropriate with respect to both the Listed Building and Conservation Area given the established mix of colours.

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<sup>18</sup> EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.



- 7.13. The proposed works to the interior of the building largely relate to the general refurbishment and upgrade of the existing modern décor in the restaurant unit, at the ground, first and second floor. Such works are thus not expected to alter or negatively impact the historic or architectural interests of the building.
- 7.14. New doily and pendent lights will be installed across the walls and ceilings on the ground, first and second floor. Both new sets of lights will be fitted to modern building fabric, and whilst further works will be carried out through the routing of wiring, openings made will be localised and fabric removed will be of no historic or architectural interest.
- 7.15. Within the ground floor dining area, a screen will be installed between a set of existing banquette seating. This addition will not be full height, but will subdivide the dining space of the restaurant, adding further privacy for diners. The existing layout at the ground floor is not historic, nor are there any historical features. Accordingly, the screen is not expected to have any negative impacts on the historic or architectural interests of the building as its appearance will allow for continued views through. It will be read as a decorative element rather than a partition.
- 7.16. Within the second-floor dining area, an existing wall will be redecorated with a new aux reeded glass and timber screen with low level wall panelling. The installation of the screen will result in no impacts to the appreciation of the layout of the space, nor will it result in any notable

impacts to historic fabric. The screen will form part of the new décor in the restaurant and will add to the retail experience within the unit. Therefore, the proposed screen and panelling will have a neutral impact to the Listed Building.

### Seven Dials Conservation Area

- 7.17. When considering potential impacts on the Conservation Area, it is important to note that the site forms only one small part of the asset.
- 7.18. Paragraph 207 of the *NPPF* states that it is necessary to consider the relevant significance of the element of the Conservation Area which has the potential to be affected and its contribution to the significance of the designation as a whole, i.e., would the application proposals undermine the significance of the Conservation Area as a whole?<sup>19</sup>
- 7.19. This approach, and its compliance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, is supported by Case Law, with a 2020 High Court Judgement confirming that:
- “Section 72 requires an overall assessment of the likely impact of a proposed development on the conservation area, and not just that part of it where the development site is located”.***<sup>20</sup> (my emphasis)
- 7.20. As discussed, the proposals to the exterior largely relate to alterations to the existing signage and incorporation of

<sup>19</sup> DLUHC, *NPPF*, para. 207.

<sup>20</sup> *Spitfire Bespoke Homes Ltd v Secretary of State for Housing Communities And Local Government* [2020] EWHC 958 (Admin).

new signage elements. Whilst the externally illuminated halo fascia sign is considered more contemporary than the existing signage scheme, it provides a more active shopfront, particularly during the night-time opening, that benefits the retail occupant and ensures the fascia is not cluttered with other methods of lighting such as trough or spotlights. The proposed signage will be appropriately sized and proportionate to the size of its fascia.

- 7.21. The repainting of the application shopfront to 'Red PF-06' is not expected to negatively impact the character and appearance of the Conservation Area. The adjacent No. 24, already features a bold colour scheme, as do many other shopfronts in the Conservation Area. The proposals will not alter the current appreciation of the wider historic and architectural interests of the Conservation Area as a *whole*.
- 7.22. Therefore, it is not considered that the proposed signage scheme would result in any negative impacts to the character and appearance and thus significance of the Conservation Area. The proposals will thus result in 'no harm' to the significance of the Seven Dials Conservation Area.

## 8. Conclusions

- 8.1. Pegasus Group have been commissioned by Rosa's London Limited to prepare a Built Heritage Statement to consider the proposed external and internal alterations at 26 Earlham Street.
- 8.2. The application site comprises a single retail unit, which forms part of the wider Grade II Listed 24 and 26 Earlham Street. The site also falls within the designated bounds of the Seven Dials Conservation Area.
- 8.3. The heritage significance of 24 and 26 Earlham Street is principally embodied in the two buildings' physical fabric which derives historic and architectural interest as a surviving example of early-19<sup>th</sup>-century redevelopment in the Seven Dials area.
- 8.4. The significance of the Seven Dials Conservation Area is principally derived from those elements of its intrinsic character and appearance. These comprise aspects of its historic layout and street patterns, historic built form and varied development, all of which contribute to the combined historic and architectural, artistic and archaeological interest of the Conservation Area.
- 8.5. The proposals to the interior will not result in any notable physical impacts to historic fabric and mainly relate to the alteration or replacement of modern décor and furnishings of the fit-out of the retail unit approved in 2016. The proposals to the front elevation affect the ground floor shopfront, which is modern, thus it is

considered that there are also no notable impacts to the historic fabric of the Grade II Listed buildings.

- 8.6. Overall, the proposals will result in 'no harm' to the significance of both the Grade II Listed 24 and 26 Earlham Street and the Seven Dials Conservation Area. The proposals will therefore satisfy the statutory requirements set out in Section 66 (1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposals will also satisfy Policy D1, D2, D3 and D4 of the Camden Council Local Plan and HC1 of The London Plan.

# Appendix 1: Assessment Methodology

## Assessment of significance

In the *NPPF*, heritage significance is defined 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. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”<sup>21</sup>*

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.<sup>22</sup>

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.<sup>23</sup> These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.<sup>24</sup>

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** *As defined in the Glossary to the National Planning Policy Framework, there will*

*be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.<sup>25</sup>

Significance results from a combination of any, some, or all of the interests described above.

<sup>21</sup> DLUHC, *NPPF*, pp. 72–73.

<sup>22</sup> Historic England, *GPA:2*.

<sup>23</sup> Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

<sup>24</sup> DLUHC, *NPPF*, p. 72; DLUHC, *PPG, Annex 2*.

<sup>25</sup> DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

The most-recently issued Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.<sup>26</sup>

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

### Setting and significance

As defined in the *NPPF*:

***“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”<sup>27</sup>***

Setting is defined 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.”<sup>28</sup>***

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

### Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.<sup>29</sup>

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

<sup>26</sup> Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).

<sup>27</sup> DLUHC, *NPPF*, p. 73.

<sup>28</sup> DLUHC, *NPPF*, p. 72.

<sup>29</sup> Historic England, *GPA:3*, pp. 8, 11.



paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

***Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.***

***Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”<sup>30</sup>***

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<sup>30</sup> Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

<sup>31</sup> DLUHC, NPPF, para. 200 and fn. 68.

## Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the NPPF and the PPG, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 200 of the NPPF, comprising Grade I and II\* Listed buildings, Grade I and II\* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 68 of the NPPF;<sup>31</sup>
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 200 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);<sup>32</sup> and

<sup>32</sup> DLUHC, NPPF, para. 200.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *“buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”*.<sup>33</sup>

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

### Grading significance

There is no definitive grading system for assessing or categorising significance outside of the categories of Designated Heritage Assets and Non-Designated Heritage Assets, specifically with regards to the relative significance of different parts of an asset.

ICOMOS guidance recognises that a degree of professional judgement is required when defining significance:

***“...the value of heritage attributes is assessed in relation to statutory designations, international or national, and priorities or recommendations set out in national research agendas, and ascribed values. Professional judgement is then used to determine the importance of the resource. Whilst this method should be used as objectively as possible, qualitative***

***assessment using professional judgement is inevitably involved.”***<sup>34</sup>

This assessment of significance adopts the following grading system:

- **Highest significance:** Parts or elements of a heritage asset, or its setting, that are of particular interest and are fundamental components of its archaeological, architectural, aesthetic or historic interest, and form a significant part of the reason for designation or its identification as a heritage asset. These are the areas or elements of the asset that are most likely to warrant retention, preservation or restoration.
- **Moderate significance:** Parts or elements of the heritage asset, or its setting, that are of some interest but make only a modest contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that might warrant retention but are capable of greater adaption and alteration due to their lesser relative significance.
- **Low or no significance:** Parts or elements of the heritage asset, or its setting, that make an insignificant, or relatively insignificant contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that can be removed, replaced or altered due to their minimal or lack of

<sup>33</sup> DLUHC, PPG, paragraph 039, reference ID: 18a-039-20190723.

<sup>34</sup> International Council on Monuments and Sites (ICOMOS), *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties* (Paris, January 2011), paras. 4-10.

significance and are areas and elements that have potential for restoration or enhancement through new work.

### Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*,<sup>35</sup> and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

***"Within each category of harm (which category applies should be explicitly identified), the extent of***

***the harm may vary and should be clearly articulated."***<sup>36</sup>

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, *"preserving"* means doing *"no harm"*.<sup>37</sup>

Preservation does not mean no change, it specifically means no harm. GPA:2 states that *"Change to heritage assets is inevitable but it is only harmful when significance is damaged"*.<sup>38</sup> Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

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<sup>35</sup> Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

<sup>36</sup> DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

<sup>37</sup> R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

<sup>38</sup> Historic England, GPA:2, p. 9.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of “*what matters and why*”.<sup>39</sup> Of particular relevance is the checklist given on page 13 of *GPA:3*.<sup>40</sup>

It should be noted that this key document also states:

***“Setting is not itself a heritage asset, nor a heritage designation...”***<sup>41</sup>

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

***“Conserving or enhancing heritage assets by taking their settings into account need not prevent change”.***<sup>42</sup>

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.<sup>43</sup>

## Benefits

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<sup>39</sup> Historic England, *GPA:3*, p. 8.

<sup>40</sup> Historic England, *GPA:3*, p. 13.

<sup>41</sup> Historic England, *GPA:3*, p. 4.

<sup>42</sup> Historic England, *GPA 3*, p. 8.

<sup>43</sup> *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in **Appendix 3**, the *NPPF* (at Paragraphs 201 and 202) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.<sup>44</sup>

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 201 to 203.<sup>45</sup>

The *PPG* provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

***“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed***

<sup>44</sup> DLUHC, *NPPF*, paras. 201 and 202.

<sup>45</sup> *Including – Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); DLUHC, *NPPF*, paras. 201 and 203.



***private dwelling which secure its future as a designated heritage asset could be a public benefit.***

***Examples of heritage benefits may include:***

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.***<sup>46</sup>

Any "heritage benefits" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

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<sup>46</sup> MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.



## Appendix 2: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.<sup>47</sup> It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 16 (2) of the Act relates to the consideration of applications for Listed Building Consent and states that:

***“In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”<sup>48</sup>***

Section 66(1) of the Act goes on to state that:

***“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”<sup>49</sup>***

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<sup>47</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

<sup>48</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16(2).

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

***“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”<sup>50</sup>***

A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 202 of the current, revised NPPF, see **Appendix 3**), this is in keeping with the requirements of the 1990 Act.<sup>51</sup>

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

***“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving***

<sup>49</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

<sup>50</sup> Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

<sup>51</sup> Jones v Mordue [2015] EWCA Civ 1243.



***or enhancing the character or appearance of that area.***<sup>52</sup>

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent,

are determined in accordance with the Development Plan unless material considerations indicate otherwise.<sup>53</sup>

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<sup>52</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

<sup>53</sup> UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

## Appendix 3: National Policy Guidance

### The National Planning Policy Framework (September 2023)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in September 2023. This replaced and updated the previous *NPPF 2021*. The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

***"Plans and decisions should apply a presumption in favour of sustainable development.***

***For plan-making this means that:***

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

***the overall scale, type or distribution of development in the plan area; or***

- ii. ***any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.***

***For decision-taking this means:***

- a. ***approving development proposals that accord with an up-to-date development plan without delay; or***
- b. ***where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***
  - i. ***the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or***
  - ii. ***any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.***<sup>54</sup>

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

***“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.”***<sup>55</sup> (our emphasis)

The NPPF continues to recognise that the planning system is planned and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the NPPF as:

***“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”***<sup>56</sup>

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<sup>54</sup> DLUHC, NPPF, para. 11.

<sup>55</sup> DLUHC, NPPF, para. 11, fn. 7.

<sup>56</sup> DLUHC, NPPF, p. 68.

The NPPF goes on to define a Designated Heritage Asset as a:

***“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.”<sup>57</sup>***

As set out above, significance is also defined as:

***“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”<sup>58</sup>***

Section 16 of the NPPF relates to ‘Conserving and enhancing the historic environment’ and states at paragraph 195 that:

***“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”<sup>59</sup>***

Paragraph 197 goes on to state that:

***“In determining planning 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.”<sup>60</sup>***

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 199 and 200 are relevant and read as follows:

***“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***

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<sup>57</sup> DLUHC, NPPF, p. 67.

<sup>58</sup> DLUHC, NPPF, pp. 72–73.

<sup>59</sup> DLUHC, NPPF, para. 195.

<sup>60</sup> DLUHC, NPPF, para. 197.



**substantial harm, total loss or less than substantial harm to its significance.”<sup>61</sup>**

**“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.”<sup>62</sup>**

Section b) of paragraph 200, which describes assets of the highest significance, also includes footnote 68 of the NPPF, which states that 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.

In the context of the above, it should be noted that paragraph 201 reads as follows:

**“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, 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**
- 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 not for profit, 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.”<sup>63</sup>**

Paragraph 202 goes on to state:

**“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.”<sup>64</sup>**

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 206 that:

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<sup>61</sup> DLUHC, NPPF, para. 199.

<sup>62</sup> DLUHC, NPPF, para. 200.

<sup>63</sup> DLUHC, NPPF, para. 201.

<sup>64</sup> DLUHC, NPPF, para. 202.

***“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. 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.”<sup>65</sup>***

Paragraph 207 goes on to recognise that “not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance” and with regard to the potential harm from a proposed development states:

***“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 201 or less than substantial harm under paragraph 202, 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.”<sup>66</sup>*** (our emphasis)

With regards to non-designated heritage assets, paragraph 203 of NPPF states that:

***“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing***

***applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”<sup>67</sup>***

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

### **National Planning Practice Guidance**

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

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<sup>65</sup> DLUHC, NPPF, para 206.

<sup>66</sup> DLUHC, NPPF, para. 207.

<sup>67</sup> DLUHC, NPPF, para. 203.

***“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”<sup>68</sup>***

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

***“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.***

***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which***

***harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”<sup>69</sup>*** (our emphasis)

#### **National Design Guide:**

Section C2 relates to valuing heritage, local history and culture and states:

***“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”<sup>70</sup>***

***“Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.”<sup>71</sup>***

It goes on to state that:

***“Well-designed places and buildings are influenced positively by:***

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***

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<sup>68</sup> DLUHC, PPG, paragraph 007, reference ID: 18a-007-20190723.

<sup>69</sup> DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

<sup>70</sup> DLUHC, NDG, para. 46.

<sup>71</sup> DLUHC, NDG, para. 47.



- *the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;*
- *the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.*

*Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21<sup>st</sup> century.<sup>72</sup>*

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<sup>72</sup> DLUHC, NDG, paras. 48–49.

## Appendix 4: Relevant Development Plan Policies

Applications for Listed Building Consent and Advertisement Consent where relevant, within Seven Dials are currently considered against the policy and guidance set out within the Camden Council Local Plan (adopted July 2017) and The London Plan (adopted March 2021).

### *Camden Council Local Plan*

#### *“Policy D1 Design*

*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;*
- 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.*

#### *Tall buildings*

*All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:*



- p) *how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;*
- q) *the historic context of the building's surroundings;*
- r) *the relationship between the building and hills and views;*
- s) *the degree to which the building overshadows public spaces, especially open spaces and watercourses; and*
- t) *the contribution a building makes to pedestrian permeability and improved public accessibility.*

*In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.*

#### **Public art**

*The Council will only permit development for artworks, statues or memorials where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.*

#### **Excellence in design**

*The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design"*

#### **"Policy D2 Heritage**

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

#### **Designated heritage assets**

*Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) *the nature of the heritage asset prevents all reasonable uses of the site;*
- b) *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- 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.*

*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.*

#### **Conservation areas**

*Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.*

*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.*

#### *Listed Buildings*

*Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:*

- 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.*

#### *Archaeology*

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

#### *Other heritage assets and non-designated heritage assets*

*The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.*

*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."*

#### *"Policy D3 Shopfronts*

*The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features.*

*When determining proposals for shopfront development the Council will consider:*

- a) *the design of the shopfront or feature, including its details and materials;*
- b) *the existing character, architectural and historic merit and design of the building and its shopfront;*
- c) *the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;*
- d) *the general characteristics of shopfronts in the area;*
- e) *community safety and the contribution made by shopfronts to natural surveillance; and*
- f) *the degree of accessibility.*

*The Council will resist the removal of shop windows without a suitable replacement and will ensure that where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.*

*Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention. Where a new shopfront forms part of a group where original shop fronts survive, its design should complement their quality and character."*

#### **"Policy D4 Advertisements**

*The Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting*

*and host building and be of the highest standard of design, material and detail.*

**We will support advertisements that:**

- a) *preserve the character and amenity of the area; and*
- b) *preserve or enhance heritage assets and conservation areas.*

**We will resist advertisements that:**

- c) *contribute to an unsightly proliferation of signage in the area;*
- d) *contribute to street clutter in the public realm;*
- e) *cause light pollution to nearby residential properties or wildlife habitats;*
- f) *have flashing illuminated elements; or*
- g) *impact upon public safety.*

*The Council will resist advertisements on shopfronts that are above fascia level or ground floor level, except in exceptional circumstances.*

*Shroud advertisements, banners, hoardings / billboards / large outdoor signboards are subject to further criteria as set out in supplementary planning document Camden Planning Guidance on advertisements."*

**The London Plan**

***“HC1 Heritage conservation and growth***

***A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.***

***B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:***

***1) setting out a clear vision that recognises and embeds the role of heritage in place-making***

***2) utilising the heritage significance of a site or area in the planning and design process***

***3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place***

***4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.***

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

***D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.***

***E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.”***



## Appendix 5: Full List Entry

### 24 AND 26, EARLHAM STREET

#### Official list entry

**Heritage Category:** Listed Building

**Grade:** II

**List Entry Number:** 1342093

**Date first listed:** 15-Jan-1973

**Statutory Address 1:** 24 AND 26, EARLHAM STREET

#### Location

**Statutory Address:** 24 AND 26, EARLHAM STREET

The building or site itself may lie within the boundary of more than one authority.

**District:** Camden (London Borough)

**Parish:** Non Civil Parish

**National Grid Reference:** TQ 30038 81071

#### Details

CAMDEN

TQ3081SW EARLHAM STREET 798-1/105/352 (South side) 15/01/73  
Nos.24 AND 26

GV II

Terraced houses with shops. Early C19, altered mid C19. Multi-coloured stock brick; No.26 painted. Slate mansard roof with

dormers. 3 storeys. 2 windows each: No.24 with 4-window return, blank windows alternating. C20 shopfronts. Architraved sash windows with 1st floor console bracketed cornice. No.24 with stucco cornice inscribed "R PORTWINE". Original lead rainwater head. INTERIORS: not inspected.

**Listing NGR:** TQ3003681069

#### Legacy

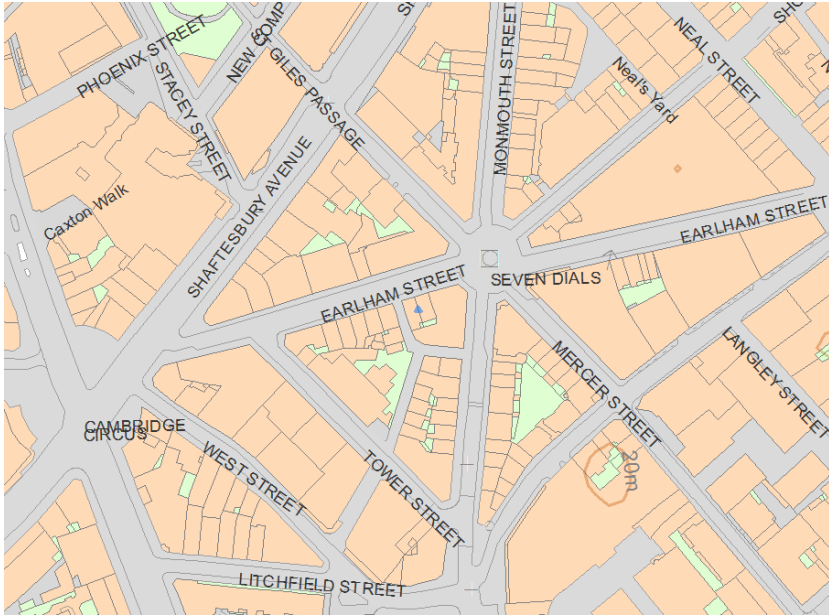
The contents of this record have been generated from a legacy data system.

**Legacy System number:** 477152

**Legacy System:** LBS

#### Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



**End of official list entry**



Planning (Listed Buildings and Conservation Areas) Act 1990  
Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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