



## Heritage Statement

---

**Travelodge Covent Garden, 10 Drury Lane,  
High Holborn, WC2B 5RE**

For:

**Travelodge Hotels Ltd and Falkerstone Ltd**

---

February 2024

**Smith Jenkins Ltd**

**Milton Keynes Office:** 7 Canon Harnett Court, Wolverton Mill, Milton Keynes, MK12 5NF

**London Office:** Studio 11.2.1., The Leather Market, 11-13 Weston Street, London, SE1 3ER

**Tel:** 01908 410422

## Contents

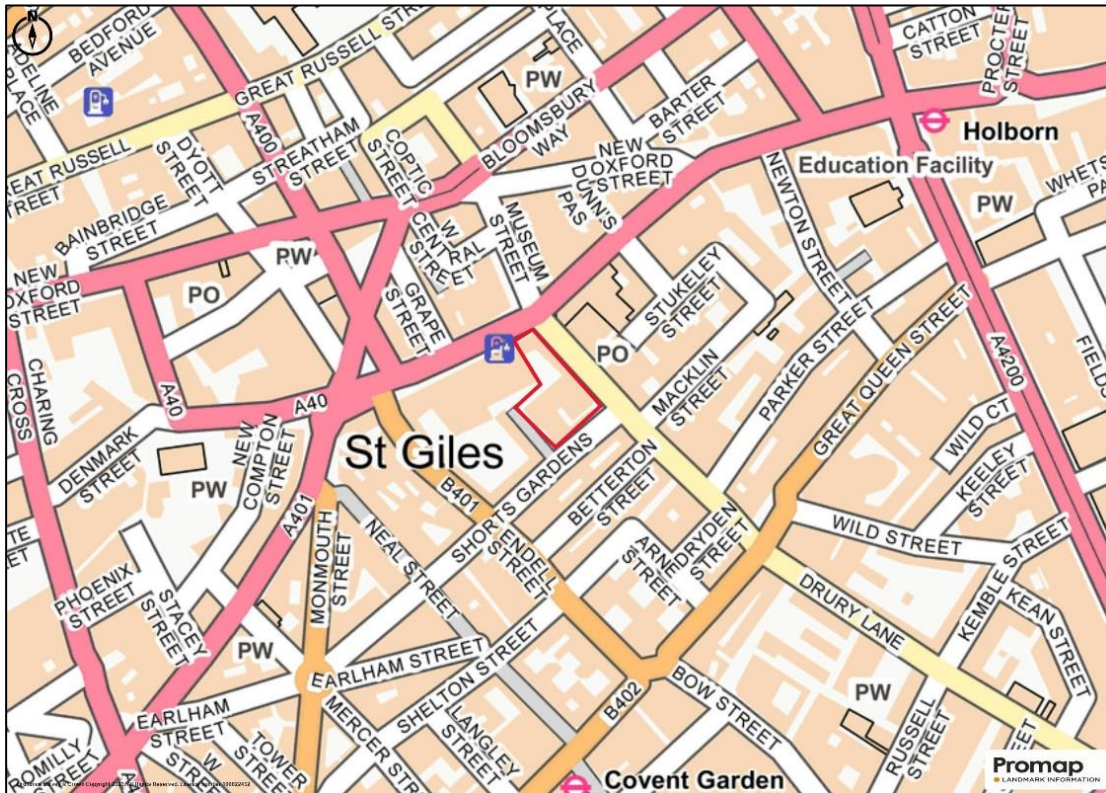
		<b>Page</b>
1	Introduction	1
2	The Heritage Assets	3
3	Historic development	4
4	Significance	8
5	Assessment of proposals	13
6	Conclusion	18

**Appendix 1**      Heritage Asset Map

**Appendix 2**      Heritage Planning Policy

## 1 Introduction

- 1.1 This Heritage Statement has been prepared by Smith Jenkins Planning & Heritage on behalf of Travelodge Hotels Ltd and Falkerstone Ltd in support of the proposed scheme at Travelodge Covent Garden, 10 Drury Lane, High Holborn, London, WC2B 5RE (hereafter referred to as 'the Site').



1.1 - Site location plan

- 1.2 The development proposals comprise:

*'The erection of two-storey extension forming new step free entrance at street level; works to car parking area and addition of a new floor to create 55 new hotel bedrooms at levels 1 & 2; erection of two storey extension forming new entrance at street level; infilling of undercroft at Level 3 and new flat roof link to extend existing hotel bar/restaurant.'*

- 1.3 The Site does not contain any designated or non-designated heritage assets. It lies adjacent to the Seven Dials Conservation Area boundary and also opposite the Grade II listed '186 and 187 Drury Lane'.

- 1.4 Paragraph 200 of the National Planning Policy Framework (NPPF) 2023 sets out the information requirements for determining applications and states that:

*'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made to their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance' (NPPF, 2023).*

- 1.5 This Heritage Statement is a standalone document prepared to satisfy paragraph 200 of the NPPF. In response to these policy requirements, Section 2 of this report identifies the heritage assets which may be affected by the application proposals. Section 3 sets out the historic development of the application site and the surrounding area, whilst Section 4 provides statements of significance for the heritage assets identified within Section 2. These are relative to the scale, nature and effect of the proposed development.
- 1.6 Section 5 provides an assessment of the application proposals on the significance of the identified heritage assets, based on national, regional and local policy and guidance. The heritage planning policy context for the consideration of these proposals is set out in Appendix A. This includes the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, regional and local planning policy.

## 2 The Heritage Assets

2.1 A heritage asset is defined by 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)’ (NPPF, 2023).*

2.2 A heritage asset map is presented in Appendix A at the end of this report.

### Designated Heritage Assets

2.3 A designated heritage asset is described by the NPPF as:

*‘A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation’ (NPPF, 2023).*

2.4 Such assets are statutorily identified as having a level of heritage (architectural and/or historic) interest to justify designation. There are then particular procedures in planning decisions to ensure that their special interest is preserved or enhanced.

### Listed buildings

2.5 The Site sits opposite the Grade II listed ‘186 and 187 Drury Lane’ (NHLE: 1342087).

### Conservation areas

2.6 The Site lies adjacent to the boundary of the Seven Dials Conservation Area on its eastern and southern sides. A comprehensive management appraisal for the conservation area was published and adopted in 1998.

2.7 As per the Planning (Listed Buildings and Conservation Areas) Act 1990, the setting of conservation areas is not a statutory duty. However, the NPPF states that the setting of a designated heritage asset can contribute to its significance.

### Non-designated heritage assets

2.8 The NPPF identifies that heritage assets not only include those which are designated (often with statutory protection), but also those assets identified by the local planning authority which could include local listing or buildings of townscape merit. Any such designation, for the purposes of the NPPF, are considered to constitute non-designated heritage assets.

2.9 The London Borough of Camden manages a Local List which was adopted in January 2015. The closest Locally Listed building to the Site is 181 High Holborn, an early-20<sup>th</sup> century commercial building on the corner of Drury Lane and High Holborn. This has been scoped out for further assessment as there are no intervening views between the asset and the Site.

### 3 Historic development

#### Brief historic background of Drury Lane and Covent Garden

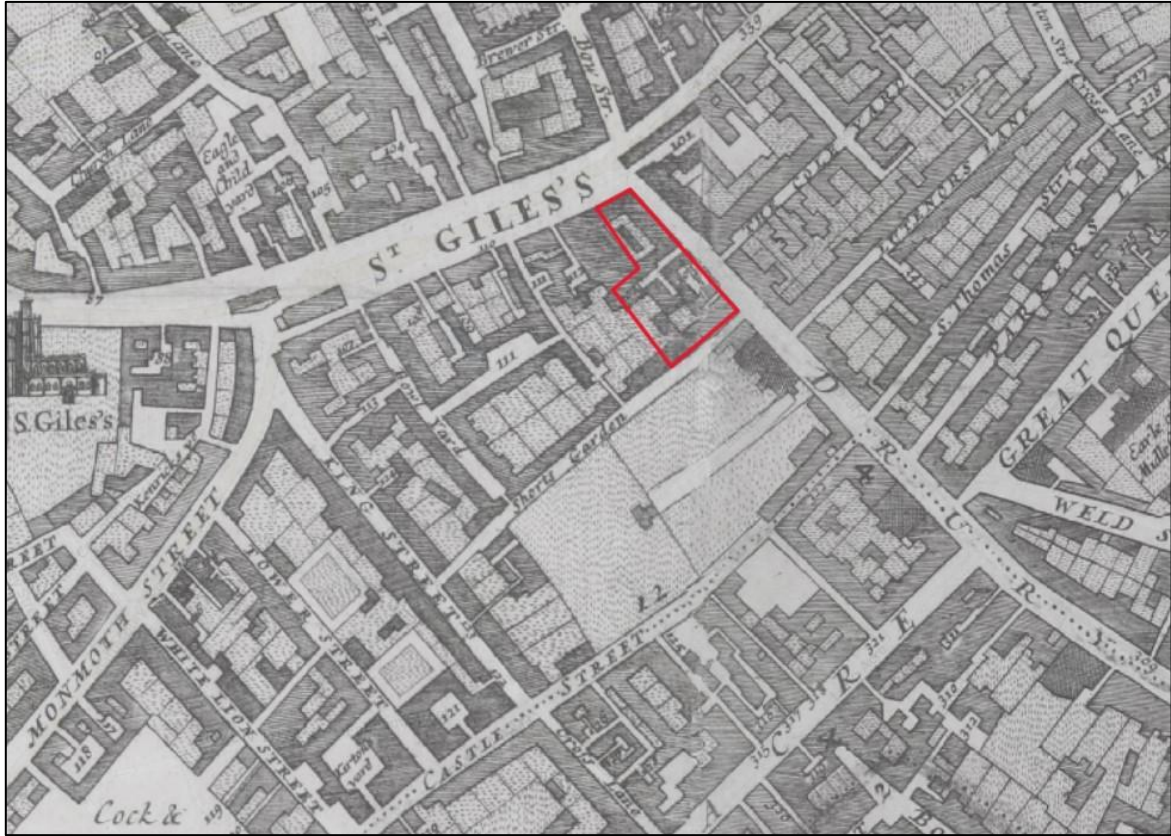
- 3.1 The Site is located on Drury Lane at the edge of the district of Covent Garden, on the eastern fringes of the West End in London.
- 3.2 The early evidence of settlement in the area can be traced to the Roman period when what is now the Strand, running along the southern boundary of Covent Garden, was part of the main route between Roman London (*Londinium*) and Silchester (*Calleva Atrebatum*). The Roman city was abandoned in the early Anglo-Saxon period and a new settlement grew outside of the city walls around the area of Covent Garden known by the 670s as *Lundenwic*. From 886 King Alfred the Great gradually shifted the settlement back into the old Roman town, likely as the surviving Roman walls provided greater defence against Viking invaders, and the site of *Lundenwic* slowly returned to fields.
- 3.3 The first mention of a walled garden in the area appears around the beginning of the 13<sup>th</sup> century in reference to lands owned by the Benedictine monks of the Abbey of St Peter in Westminster. By the 13<sup>th</sup> century the garden was recorded as being 40-acres in size with a mixture of orchard, meadow, pasture and arable land. The first record to the name of Covent Garden appears in 1515.
- 3.4 Following the Dissolution of the Monasteries in 1540, the lands of Westminster Abbey reverted to the crown, including Covent Garden and an additional 7 acres of land to the north called Long Acre. In 1552 King Edward VI awarded the lands to John Russell, 1<sup>st</sup> Earl of Bedford. On part of the land the 1<sup>st</sup> Earl built Bedford House, an Elizabethan manor which became the family home until 1704.
- 3.5 Significant building first took place from the mid-17<sup>th</sup> century when the 4<sup>th</sup> Earl of Bedford worked with the 2<sup>nd</sup> Earl of Monmouth to secure a license to build new houses on the land. Russell commissioned the famous architect Inigo Jones to design a church and three terraces of grand houses around a large central square to attract wealthy residents, the first of its type in London. It was in 1654 that the Earl of Bedford allowed several temporary fruit and vegetable stalls to be built in the gardens of Bedford House and by the turn of the 18<sup>th</sup> century the market was held three times a week, with permanent shops beginning to be built along the garden wall.
- 3.6 Although initially attracting wealthy residents, the character of the area began to change as the market grew and soon new coffee shops, taverns and brothels were opened. The reputation of the area eventually led to an Act of Parliament being drawn up to bring the area under control. The area also became synonymous with theatre and music, the Theatre Royal on Drury Lane opened in 1663 and The Royal Opera House in 1732. By the 18<sup>th</sup> century Covent Garden had become a well-known red-light district with a number of prominent brothels and an infamous nightlife. As well as the nightlife, the market was still extremely successful and in 1828 a new market hall was built to provide a more permanent and organised trading centre.
- 3.7 The area's popularity soared through the 20<sup>th</sup> century and despite sporadic bomb damage Covent Garden emerged from the war relatively unharmed compared to other areas of London. By the 1960s, when London was experiencing a boom period after the war, the traffic congestion around Covent Garden was impeding its function as a market. Significant redevelopment was planned but following public outcry the buildings within and around the square were legally protected in the 1970s. The following year the market moved to a new site in Nine Elms in Vauxhall and following a period of decline the central market was re-opened as a shopping centre in 1980. This was the beginning of a

new era for Covent Garden and its surrounding environment as it became a centre for shopping and leisure with a strong connection to its most famous theatres.

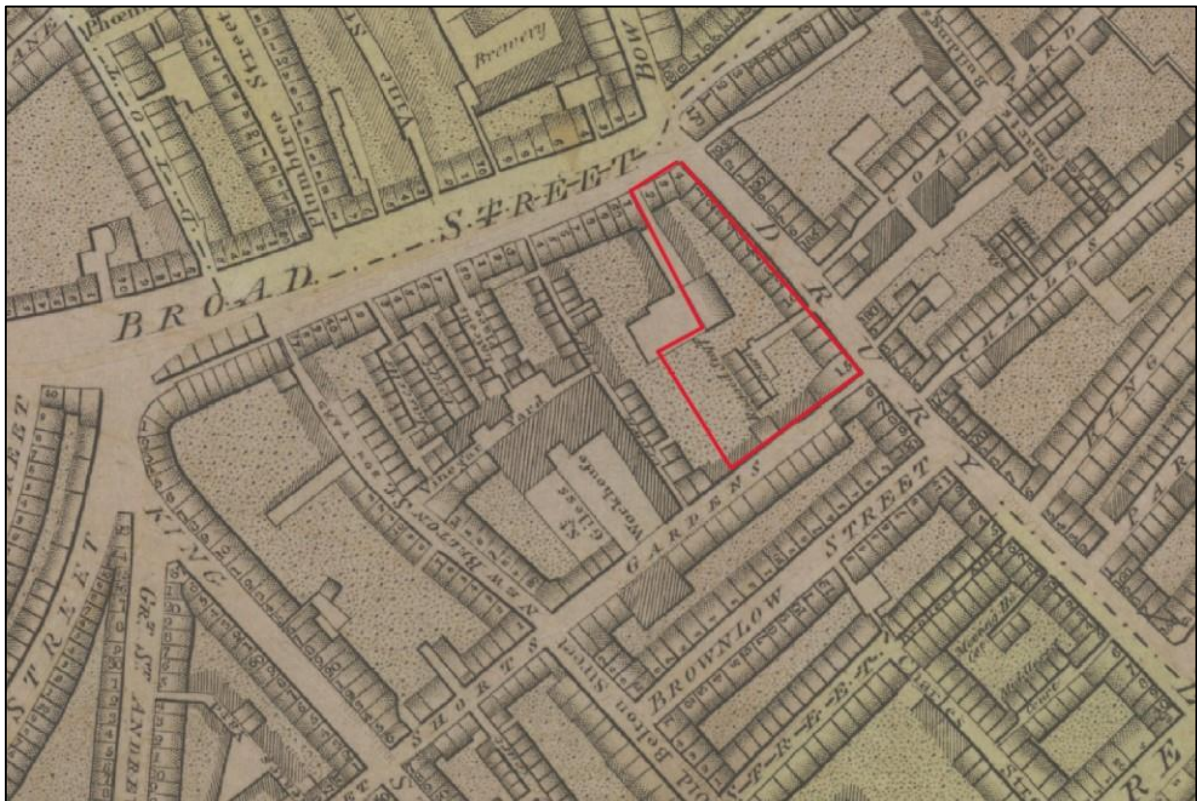
### **Historic development of the Site**

- 3.8 The earliest available map of the Site is from 1682 (Figure 3.1), showing the rapid development of the area following the early development by the Earl of Bedford from the mid-17<sup>th</sup> century. The Site sits on the corner of St Giles's and Drury Lane and is occupied by buildings facing onto the main roads with alleys and courtyards leading to gardens at the rear. The rest of the area is of a similar development pattern with large terraced houses with gardens to the rear. To the west is the parish church of St Giles's In the Fields (which was rebuilt in the early-18<sup>th</sup> century) and to the south is Shorts Gardens, an area of cultivated gardens which were sold in 1690 and developed as part of Seven Dials.
- 3.9 Rocque's Map of 1746 (not shown) shows that the Site remains largely the same by the mid-18<sup>th</sup> century. The majority of undeveloped land has now been filled in, including Shorts Gardens to the south which now forms several blocks of new terraced housing. Horwood's Map of 1799 (Figure 3.2) provides a more detailed view from the late-18<sup>th</sup> century. The Site is framed by terrace housing with open gardens to the rear and a couple of courtyards off of Broad Street and Drury Lane. In the wider area, a workhouse has been opened on the northern side of Shorts Gardens but the rest of the surrounding streetscape remains the same.
- 3.10 By the late-19<sup>th</sup> century (Figure 3.3) a large part of the Site facing onto Shorts Gardens has been developed into a cooperage, for manufacturing barrels. Despite this a number of the terraces remain intact, especially along Drury Lane. In the wider area the development pattern is similar with areas of terraced housing being cleared for larger developments including more manufacturing buildings, hospitals, schools, pubs and entertainment. The surrounding road layouts have also undergone improvement with roads being widened and a more organised junction being set up at the intersection of Broad Street and Shaftesbury Avenue.
- 3.11 By the mid-20<sup>th</sup> century (Figure 3.4) more development had taken place within and around the Site. The cooperage remains standing with its central yard and main access off of what has now been renamed High Holborn. A number of houses have been cleared on the northern side of the site for the development of Moorfields Westminster Branch Eye Hospital, and along Drury Lane a number of terraces have been cleared for the development of two blocks of flats. Further development has taken place in the surrounding area including the establishment of larger buildings including office buildings, residential blocks of flats and theatres and entertainment spaces.
- 3.12 The Site was completely cleared in the early 1960s to make way for the construction of the present hotel, which was completed in 1964 and remains largely the same to this day.



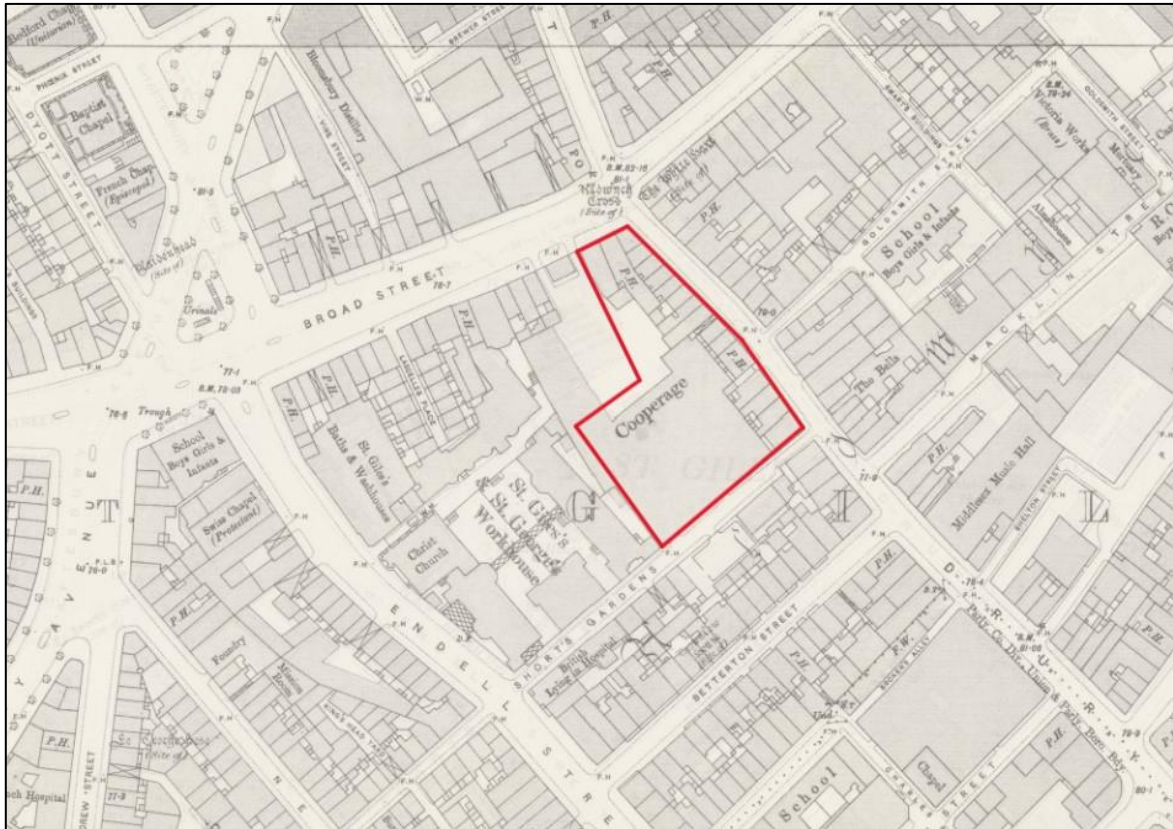


3.1 - Morgan's Map of 1682



3.2 - Horwood's Map of 1799





3.3 - Ordnance Survey Map of 1893 - 1896



3.4 - Ordnance Survey Map 1940s-60s

## 4 Significance

4.1 The significance of a heritage asset is defined within the glossary of the NPPF 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’ (NPPF, 2023).*

4.2 Listed buildings are statutorily designated and, for the purposes of the NPPF, are designated heritage assets. Recognising this statutory designation, buildings must hold special architectural or historic interest. The Department of Culture, Media and Sport publish the ‘Principles of Selection for Listed Buildings (2010)’ which is supported by thematic papers, ‘Listing Selection Guides’, based on building type, which give more detailed guidance.

4.3 Conservation Areas are identified if they are of special architectural or historic interest, the character or appearance of which should be preserved or enhanced. Historic England has published guidance on the designation of Conservation Areas which provides a framework for the identification of those features that form the character and appearance.

4.4 The identification of a site as a non-designated heritage asset does not provide any legal protection of such asset, however, for the purposes of the NPPF, they are a material consideration in the determination of applications.

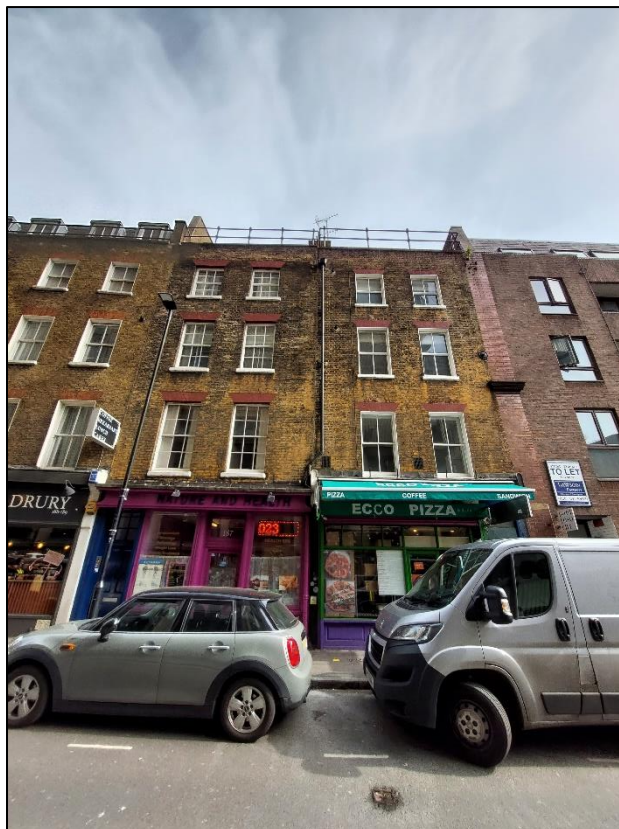
4.5 Historic England has published ‘Conservation Principles’ (2008) which identifies four types of heritage values that a heritage asset (whether it be designated or non-designated) may hold – aesthetic, communal, evidential or historic interest. Conservation Principles (2008) is currently being updated by Historic England after a Consultation Draft was published on 10th November, closing on 2nd February 2018. Historic England has also published a Good Practice Advice Notes on the ‘Setting of Heritage Assets’ (2nd Edition, 2017) which is used to understand the surroundings of a heritage asset which may contribute to the significance of a heritage asset.

### Assessment

4.6 The following statements of significance for the identified heritage assets (set out in Section 2) are proportionate to the importance of the asset and the likely impact of the proposals.

## **186 and 187 Drury Lane**

- 4.7 186 and 187 Drury Lane are a Grade II listed pair of buildings and were designated on the 15<sup>th</sup> January 1973 (NHLE: 1342087). They are located less than 10m from the Site boundary on the opposite side of Drury Lane and are also located in the Seven Dials Conservation Area.



4.1 – 186 and 187 Drury Lane.

### **Historic interest**

- 4.8 186 and 187 Drury Lane are of historic interest as a pair of terraced houses from the early-18<sup>th</sup> century with later shopfronts and refacing. This pair of houses are potentially the oldest and only surviving pair from the early-18<sup>th</sup> century, a period of historical change for the street and the wider area. At the end of the 17<sup>th</sup> century the Theatre Royal was built on the street then a few years later the Great Plague of 1665 broke out at the north of the street only coming to an end following the Great Fire the following year in 1666. Morgan's Map of 1682 (Figure 3.1) shows houses previously located on the site. It's likely these were rebuilt following the Great Fire, which encouraged rebuilding of timber-frame houses as a reaction to new building codes and also to accommodate for displaced citizens of the City of London, a large number who moved to West London.

### **Architectural interest**

- 4.9 186 and 187 Drury Lane are of architectural interest as a pair of terraced houses from the early-18<sup>th</sup> century with later ground floor shops and refacing from the late-18<sup>th</sup> century. Constructed of multi-coloured stock brick, the terraces are four storeys and two bays wide each. Number 186 has 19<sup>th</sup>/20<sup>th</sup>



century four paned sash windows whilst 187 has potentially 18<sup>th</sup> century twelve pane sashes. Number 186 has a 20<sup>th</sup> century timber shopfront with panelled risers, plate glass window, double panelled and part-glazed doors, and a panelled door with over light. Number 187 has an early-19<sup>th</sup> century shopfront with flat bay windows flanking a central part-glazed door with over light, inswept frieze and projecting cornice. There may be some significance retained in internal features but these have not been inspected or reported.

### **Setting**

- 4.10 The setting of 186 and 187 Drury Lane makes a contribution to its significance which is also reflected in its inclusion in the Seven Dials Conservation Area. The pair of assets form part of a terrace along the northern side of Drury Lane which includes buildings from varying architectural periods but all of a similar scale and complimentary styles. The terrace can be appreciated in views up and down Drury Lane. The site sits prominently in the assets setting and in areas has an overbearing presence, but overall its affect on the assets setting is neutral as it does not stop the buildings from being appreciated.



4.2 – View northwards up Drury Lane with the Site on the left and the asset within the terrace on the right.



4.3 – View from the listed pair of buildings towards the hotel.

### **Summary of significance**

- 4.11 186 and 187 is of special architectural and historic significance as an early-18<sup>th</sup> century pair of terraced houses surviving from the early development of Drury Lane. Their setting contributes to their significance as they form a part of an attractive terrace along the northern side of Drury Lane which is appreciated in views up and down the street.

## Seven Dials Conservation Area

- 4.12 The Site is located just outside of the boundary of the Seven Dials Conservation Area which was designated in 1974. The Seven Dials Conservation Area Statement was adopted by the London Borough of Camden in 1998 and it splits the conservation area into three sub-areas. Due to the size of the conservation area the assessment has focused on the area adjacent to the site which comprises Sub-Area 3 – Macklin Street.

### Historic development

- 4.13 Drury Lane runs through the centre of the area and is considered one of the oldest roads in Covent Garden, possibly dating back to the Saxon settlement of *Lundenwic*. Historically known as Via de Aldwych, it was renamed Drury Lane after Sir William Drury who built a larger house at the southern end of the road in the 16<sup>th</sup> century. Substantial development did not take place until the middle of the 16<sup>th</sup> century and into the 17<sup>th</sup> century with the laying out of streets and residential houses as people began to expand out from the City of London.
- 4.14 The area rapidly developed and by the 19<sup>th</sup> century the housing conditions around Macklin Street and the surrounding area had seriously deteriorated leading to a recommendation by the medical officer to clear the area and rebuild. As a result the Metropolitan Board of Works undertook a large clearance scheme in 1886 known as the Shelton Improvement Scheme although failed to rebuild the houses displacing a large number of people.
- 4.15 With the establishment of the London County Council (LCC) in 1889 and the introduction of the Housing of the Working Classes Act in 1890, the government had new powers to prepare new housing schemes in identified deprived areas. On the previously cleared streets of Shelton Street LCC built the first public housing in Camden which influenced further similar development throughout the borough.
- 4.16 Development continued into the 20<sup>th</sup> century and the area emerged relatively unscathed from bomb damage after the Second World War. Some areas were cleared for new development but this was largely retained to isolated sites due to the widespread protection of the area in the 1970s following redevelopment proposals.

### Character and appearance

- 4.17 The character and appearance of Sub-Area 3 of the Seven Dials Conservation Area differs across the various streets which make up the area. Drury Lane, which runs north to south, is predominantly four-storey terraced houses which were originally domestic but many now have commercial premises on the ground floor. The street retains many 19<sup>th</sup> century buildings of note in slightly differing architectural styles and shades of brick which give the street an interesting urban texture. The designated 186 and 187 Drury Lane are a rare surviving pair from the 18<sup>th</sup> century which gives a snapshot into how the street would have originally looked before extensive rebuilding. Piecemeal development from the 20<sup>th</sup> century resulted in some infilling. One building of note is the 1980s block on the corner of Drury Lane and Stukeley Street which compliments the existing streetscape in a stark contrast to the huge scale and contrasting style of the Travelodge Hotel opposite. Views in the conservation area are experienced looking down the various streets which offer long range views where the interesting textures of the architectural terraces can be appreciated.



### **Contribution of the Site to the conservation area**

4.18 The Site is located outside of the conservation, however it does sit within its setting. The most prominent experience of the Travelodge from inside the conservation area is on the corner of Drury Lane and Shorts Gardens. Here the building dramatically contrasts with the boundary streets of conservation area in terms of massing and also architecture. Whilst the massing of the design is broken up and the taller elements are stepped back from the street, it still has a dominating presence in areas. It is also noted that the shop units which face onto Drury Lane are a notable positive addition and compliment the scale of the rest of the street.

### **Summary of significance**

4.19 The Seven Dials Conservation Area is of historic and architectural significance as it covers part of the historic centre of Covent Garden and its surrounding environs. Located just outside the City of London, Covent Garden was the site of the Anglo Saxon settlement of Lundenwic and was formally laid out and developed from the 16<sup>th</sup> century onwards. It has a unique architectural character of a mixture of buildings and institutions which are appreciated in long views up and down the various streets.



*4.4 - Buildings along Drury Lane showing the varying architecture across the conservation area.*

## 5 Assessment of proposals

- 5.1 The heritage, legal and planning policy relevant to the consideration of the application proposals is set out in Appendix A of this report. This legal and policy context includes the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF as well as regional and local policy for the historic environment.
- 5.2 In accordance with paragraph 200 of the NPPF, the significance of the designated and non-designated heritage assets that may be affected by the application proposals have been set out in Section 3 of this report.
- 5.3 The NPPF requires local planning authorities to identify and assess significance of a heritage asset that may be affected by the proposals (paragraph 201). They should take the assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.
- 5.4 Account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability, and the desirability of the new development making a positive contribution to local character and distinctiveness (paragraph 196).
- 5.5 When considering the impact of proposals on the significance of designated heritage assets, the NPPF requires (paragraph 205) that great weight should be given to their conservation and the more important the asset, the greater the weight should be. This is consistent with recent high court judgements (Barnwell Manor, Forge Fields) where great weight should be attached to the statutory duty.
- 5.6 Where a development proposal causes harm to the significance of designated heritage assets, this should either be treated as less than substantial (paragraph 208), or substantial (paragraph 207). In determining the level of harm, the relative significance of the element affected should be taken into account. Furthermore, local planning authorities are also encouraged to look for opportunities for new development within conservation areas and the setting of heritage assets to enhance or better reveal their significance. According to paragraph 212, proposals that preserve those elements of setting the make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.

### The proposals

- 5.7 The Proposals comprise:

*'The erection of two-storey extension forming new step free entrance at street level; works to car parking area and addition of a new floor to create 55 new hotel bedrooms at levels 1 & 2; erection of two storey extension forming new entrance at street level; infilling of undercroft at Level 3 and new flat roof link to extend existing hotel bar/restaurant.'*

***Reception extension***

- 5.8 The first aspect of the proposals is the proposed demolition of the existing stepped entrance onto Drury Lane which presently provides access to the raised courtyard. The present accessible entrance to the hotel is separate from the main entrance, with visitors needing to traverse almost 100m to the rear entrance of the building via Shorts Gardens. The aim of the proposals is to provide a new entrance that can be used by all visitors. The proposals aim to achieve this by providing a new level access from street level to a new enclosed entrance lobby providing direct access to the heart of the hotel, reception area and new accommodation.
- 5.9 The design of the extension picks up on the proportion and profiled detailing of the existing host building, as well as the adjacent retail units. The proposed façade will be clad in light grey cladding panels to match the concrete of the existing hotel building.
- 5.10 The structure will also host a new blue/green roof to help attenuate surface water run off, increase biodiversity and also improve the visual amenity for guests to the hotel, softening the structure.



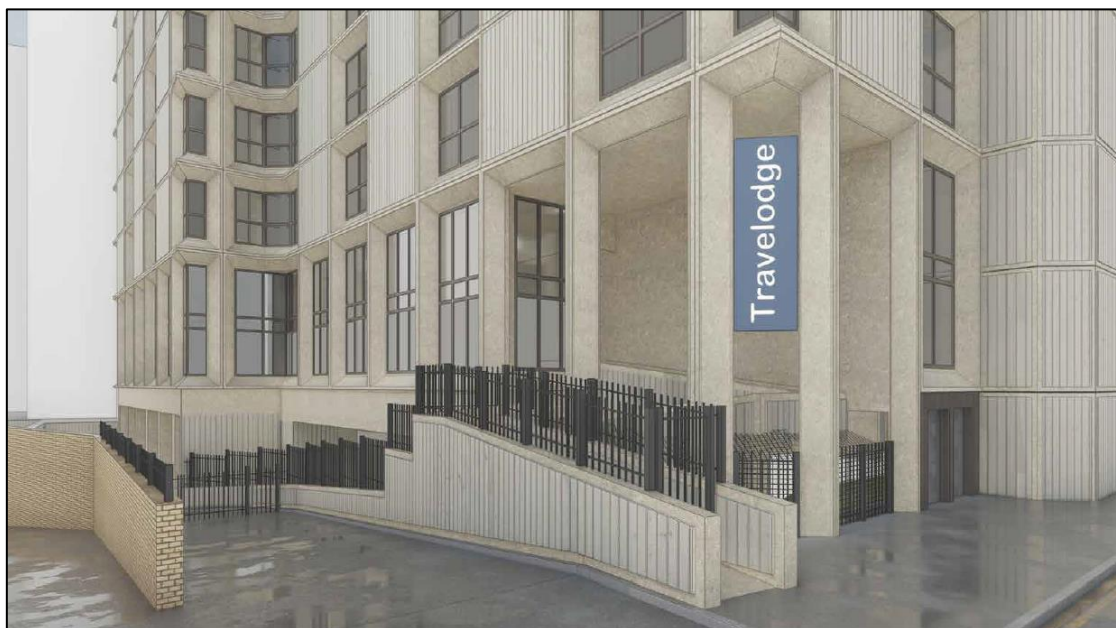
*5.1 - View of the proposed reception extension looking north along Drury Lane.*

***Undercroft infill to extend hotel bar/restaurant for guests***

- 5.11 The second aspect of the proposal comprises the infill of the existing two storey undercroft parking area on level 3 to create a larger bar/restaurant to increase the catering offering of the hotel for the increase occupancy.
- 5.12 As viewed from the exterior, this area is presently enclosed with full height glazing which creates a sheltered internal space. The proposals comprise the replacement of this glazing with a 'like for like' replacement with a thermally broken glazing system creating a weather tight internal space with obscure glazing to maintain privacy for the residents opposite.

### ***Level 1 and 2 infill extension***

- 5.13 The final aspect of the proposals comprises a two-storey infill extension and level 1 and 2 of the hotel, delivering an additional 55 bedrooms. The majority of these works would be internal with the only visible changes taking place to the rear of the building, below the Level 3 undercroft, which is presently a dark car park and ductwork. This small area is also mostly obscured from view by the vehicular ramp.



*5.2 - View of the proposed rear of the building from Shorts Gardens facing north east.*

## **Impact of application proposals**

### ***186 and 187 Drury Lane***

- 5.14 186 and 187 Drury Lane are a pair of Grade II listed townhouses located to the east of the site on the opposite side of Drury Lane. They are of special architectural and historic significance as an early-18<sup>th</sup> century pair of terraced houses surviving from the early development of Drury Lane. Their setting contributes to their significance as they form a part of an attractive terrace along the northern side of Drury Lane which is appreciated in views up and down the street. The Site makes a neutral contribution to the assets setting and significance.
- 5.15 The only aspect of the proposals that would be visible from 186 and 187 is the proposed reception extension on Drury Lane which would be located almost opposite the asset. The proposed extension has been designed to respond to the existing architectural form and materiality of the host building, in order to seamlessly integrate with the existing streetscape. The extension would have a slight increase in mass in this area of the building, but in general would continue the existing building line for the adjacent retail units and also have a more inviting presence on the streetscape than the existing concrete staircase.
- 5.16 The proposals would represent a minor change in the immediate setting of 186 and 187 Drury Lane and importantly would not affect the key aspects of their setting which is their position as part of a

terrace along the northern side of Drury Lane and not impact on views of the asset up and down the street.

- 5.17 The proposals would therefore preserve the significance of 186 and 187 Drury Lane.

### ***Seven Dials Conservation Area***

- 5.18 As per the Planning (Listed Buildings and Conservation Areas) Act 1990, the setting of conservation areas is not a statutory duty. However, the NPPF states that the setting of a designated heritage asset can contribute to its significance. The Site does sit within the setting of the conservation area, however it is concluded that the building makes a neutral contribution to its significance as despite being a dramatically contrasting building it does have some positive elements such as the ground floor retail units.
- 5.19 The proposed reception extension would be visible from inside the conservation area at the northern end of Drury Lane in views up and down the street, as shown in Figure 5.1. As previously described, the proposed extension has been designed to integrate with the host building in both architectural design and materiality. Therefore, despite representing a slight increase in mass, the extension would continue the existing building line from the retail units and also have a more inviting presence on the streetscape than the existing concrete staircase.
- 5.20 The changes to the rear of the building would be visible from Shorts Gardens looking north east, as shown in Figure 5.2. The elements of the proposals visible from the conservation area would only comprise the replacement of the windows and the infill extension. The replacement of the windows would be like for like and would therefore have no impact on the views out of the conservation area. The infill extension to Levels 1 and 2 would only slightly change the appearance of the building as it would infill the currently dark opening to the car park and remove unsightly ductwork.
- 5.21 Overall, the proposals would preserve the character and appearance of the Seven Dials Conservation Area.

## **Considerations against legislation and policy**

### ***Statutory Duties***

- 5.22 The Planning (Listed Buildings and Conservation Areas) Act 1990 place a duty upon the decision maker in determining applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.
- 5.23 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the decision maker in determining applications for planning permission to have special regard to the desirability of preserving the character and appearance of conservation areas.
- 5.24 This report has concluded that the proposed development would preserve the significance of the Grade II listed 186 and 187 Drury Lane.
- 5.25 As per the Planning (Listed Buildings and Conservation Areas) Act 1990, the setting of conservation areas is not a statutory duty. The potential impacts on the on the setting of the Seven Dials Conservation Area, which are covered by the NPPF, are discussed below.



***NPPF (2023)***

- 5.26 The significance of the designated heritage assets, as required by paragraph 200 of the NPPF, has been set out in Section 3 of this report. The application proposals would preserve the significance of the Grade II listed 186 and 187 Drury Lane and would also preserve the character and appearance of the Seven Dials Conservation Area.
- 5.27 Accordingly, the application proposals are in accordance with the NPPF.

***London Plan (2021)***

- 5.28 This report demonstrates that the application proposals that could be affected have identified and their significance assessed. The proposals will ensure that the heritage values of the surrounding area are preserved and will be enhanced through a carefully designed and high-quality scheme. The proposals are therefore in accordance with paragraph 7.8 of the London Plan.

***Local Policy***

- 5.29 This report has concluded that the proposed works would preserve the significance of the Seven Dials Conservation Area and the surrounding listed buildings. The Proposed Works are therefore in accordance with Policy D2 of the Camden Local Plan 2017.

## **6 Conclusion**

- 6.1 This Heritage Statement has been prepared to assess the impact of the Proposed Development comprising extensions and alterations to the Travelodge Covent Garden comprising the erection of a new reception extension to provide a step free entrance, and infill extensions to the rear to provide new accommodation and a larger bar and restaurant.
- 6.2 In accordance with paragraph 200 of the NPPF, the significance of the designated heritage assets which have the potential to be affected by the application proposals have been described in this statement. A clear understanding and appreciation of the significance of the heritage assets has informed the evolution of the proposals.
- 6.3 This report has concluded that the application proposals preserve the significance of the Grade II listed 186 and 187 Drury Lane and the Seven Dials Conservation Area.
- 6.4 The application proposals are in accordance with the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF (2023) and relevant regional and local policy and guidance, including the Central Bedfordshire Local Plan (July 2021).




**Appendix A: Heritage Asset Map**

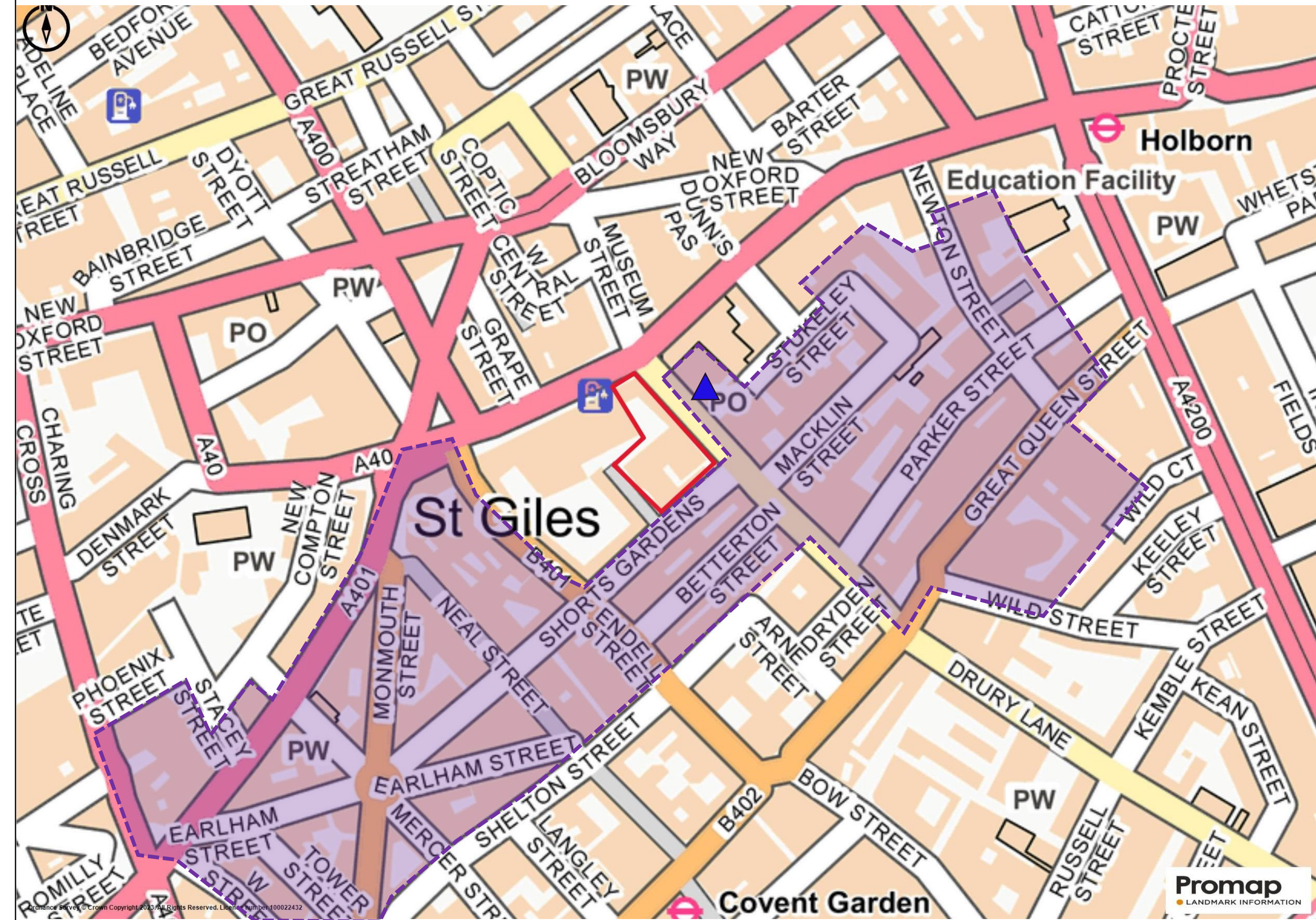


# Travelodge Drury Lane, Covent Garden

HERITAGE ASSET MAP

Key

-  SITE
-  LISTED BUILDING (SCOPED IN)
-  SEVEN DIALS CONSERVATION AREA



Not to Scale



**SmithJenkins**  
PLANNING & HERITAGE

**Promap**  
LANDMARK INFORMATION

Ordnance Survey © Crown Copyright 2023. All Rights Reserved. Licence number 100022432



## **Appendix B: Heritage Planning Policy Context**

### **Legislation**

#### **Planning (Listed Building and Conservation Areas) Act 1990**

Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from Section 16 of the 1990 Act which states that in considering applications for listed building consent, the local planning authority shall have special regard to the desirability of preserving the Listed Building or its setting or any features of special architectural or historic interest which it possesses.

Section 66 further states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

According to Section 69 of the Act a Conservation Area is an “area of special architectural or historic interest the character and the appearance of which is desirable to preserve or enhance”. It is the duty of Local Authorities to designate such areas and to use their legal powers to safeguard and enhance the special qualities of these areas within the framework of controlled and positive management of change.

Section 69 further states that it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly. Adding, The Secretary of State may from time to time determine that any part of a local planning authority’s area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

Further to this Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard to the desirability of preserving or enhancing the character and appearance of Conservation Areas. Further provisions are detailed in Section 74 of the Act.

Recent case law<sup>1</sup> has confirmed that Parliament’s intention in enacting Section 66 (1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means “to do no harm”. This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy. This can also logically be applied to the statutory tests in respect of conservation areas.

### **National Planning Policy**

#### **National Planning Policy Framework (NPPF) December 2023**

The National Planning Policy Framework (NPPF) was most recently published on the 19<sup>th</sup> December 2023 and sets out the Government’s planning policies for England and how these are expected to be applied. It has purposefully been created to provide a framework within which local people and Local Planning

---

<sup>1</sup> Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) Historic England (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18<sup>th</sup> February 2014



Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.

When determining Planning Applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the ‘golden thread’ which is expected to run through the plan-making and decision-taking activities. It should be noted however, that this is expected to apply except where this conflicts with other policies combined within the NPPF, inclusive of those covering the protection of designated heritage assets<sup>2</sup>, as set out in paragraph 11 of the NPPF.

Within section 12 of the NPPF, ‘Achieving well-designed places’, Paragraphs 126 to 136, reinforce the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high-quality places. This section of the NPPF affirms the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, reflecting the built identity of the surrounding area.

Section 16, ‘Conserving and Enhancing the Historic Environment’, Paragraphs 195-214, relate to developments that have an effect upon the historic environment. These paragraphs provide the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. This should be a positive strategy for the conservation and enjoyment of the historic environment and should include heritage assets which are most at risk through neglect, decay or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance<sup>3</sup>.

The NPPF advises local authorities to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment. These considerations should be taken into account when determining planning applications:

The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;

- The wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;
- The desirability of new development in making a positive contribution to local character and distinctiveness;
- Opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 197 of the NPPF states that when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

In order to determine applications for development, Paragraph 200 of the NPPF states that LPAs should require applicants to describe the significance of the heritage assets affected and the contribution made

---

<sup>2</sup> **Designated heritage asset** – A World Heritage Site, Scheduled Ancient Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation designated under the relevant legislation.

<sup>3</sup> **Significance** – 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 with each site’s Statement of Outstanding Universal Value forms part of its significance.

by their setting<sup>4</sup>. Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.

According to Paragraph 201, LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

Paragraph 202 adds that where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.

Paragraphs 205 to 214 consider the impact of a proposed development upon the significance of a heritage asset<sup>5</sup>. Paragraph 205 emphasises that when a new development is proposed, great weight should be given to the asset's conservation<sup>6</sup> and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.

Paragraph 208 advises that where a development will cause 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 securing its optimum viable use.

Paragraph 209 notes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. Adding, that in weighing applications that affect directly or indirectly 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.

Paragraph 210 stipulates that local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

In addition, Paragraph 212 notes that 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. Adding, proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

Paragraph 213 importantly clarifies that not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Adding, loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The NPPF therefore continues the philosophy of that upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative and sustainable approaches to managing change. English Heritage (now Historic England)

---

<sup>4</sup> **Setting of a heritage asset** - 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 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. (NPPF Annex 2: Glossary)

<sup>5</sup> **Heritage asset** – 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 and assets identified by the local planning authority (including local listing).

<sup>6</sup> **Conservation** – The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances the significance. (NPPF Annex 2: Glossary)

defined this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment.' (Constructive Conservation in Practice, English Heritage, 2009).

## **National Guidance**

### **Planning Practice Guidance (PPG) 2019**

Planning Practice Guidance (PPG) was introduced by the Government as a web-based resource on 6th March 2014 and is updated regularly, with the most recent update on 23rd July 2019. The PPG is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also states, conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.

Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available.

Key elements of the guidance relate to assessing harm. It states, an important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Adding, it is the degree of harm, rather than the scale of development that is to be assessed. The level of 'substantial harm' is stated to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF.

Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

The PPG makes clear that the delivery of development within the setting of heritage assets has the potential to make a positive contribution to, or better reveal, the significance of that asset.

Finally, the PPG provides in depth guidance on the importance of World Heritage Sites, why they are important and the contribution setting makes to their Outstanding Universal Value. The PPG also provides guidance on the approaches that should be taken to assess the impact of development on the Outstanding Universal Value of World Heritage Sites.

## **Historic England Guidance - Overview**

On the 25<sup>th</sup> March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide. This document has been replaced with three Good Practice Advice in Planning Notes (GPAs), 'GPA1: Local

Plan Making’ (Published 25<sup>th</sup> March 2015), ‘GPA2: Managing significance in Decision-Taking in the historic Environment’ (Published 27<sup>th</sup> March 2015) and ‘GPA3: The Setting of Heritage Assets (December 2017).

The GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on the how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

In addition to these documents, Historic England has published several core Advice Notes (HEAs) which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; ‘HEAN1: Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)’, ‘HEAN2: Making Changes to Heritage Assets’ (25<sup>th</sup> February 2016) and ‘HEAN3: The Historic Environment and Site Allocations in Local Plans’ (30<sup>th</sup> October 2015). In addition to these ‘HEAN4: Tall Buildings’ (March 2022), ‘HEAN7: Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021), ‘HEAN10: Listed Buildings and Curtilage’ (21<sup>st</sup> February 2018), ‘HEAN12: Statements of Heritage Significance’ (October 2019), and HEAN13. Collectively, these Advice Notes provide further information and guidance in respect of managing the historic environment and development within it.

#### **Historic England Good Practice Advice Note 1 (GPA1): The Historic Environment in Local Plans (March 2015)**

This document stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence in relation to the economic, social and environmental characteristics and prospects of an area, including the historic environment, as set out by the NPPF. The document provides advice on how information in respect of the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance). This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

Furthermore, the Local Plan can assist in ensuring that site allocations avoid harming the significance of heritage assets and their settings, whilst providing the opportunity to ‘inform the nature of allocations so development responds and reflects local character’.

Further information is given relating to cumulative impact, 106 agreements, stating ‘to support the delivery of the Plan’s heritage strategy it may be considered appropriate to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk.’ It also advises on how the heritage policies within Local Plans should identify areas that are appropriate for development as well as defining specific Development Management Policies for the historic environment. It also suggests that a heritage Supplementary Planning Document (SPD) can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.

#### **Historic England Good Practice Advice Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (March 2015)**

This document provides advice on the numerous ways in which decision-taking in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that ‘development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful

places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.’

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of development proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary. This document also provides guidance in respect of neglect and unauthorised works.

#### **Historic England Good Practice Advice Note (GPA3): The Setting of Heritage Assets (December 2017)**

This is used to understand the surroundings of a heritage asset which may contribute to its significance. It aids practitioners with the implementation of national policies and guidance relating to the historic environment found within the NPPF and PPG, once again advocating a stepped approach to assessment.

It amalgamates ‘Seeing the History in the View’ (2011) and ‘Setting of Heritage Assets’ (2015) forming one succinct document which focuses on the management of change within the setting of heritage assets.

The guidance is largely a continuation of the philosophy and approach of the previous documents, albeit now with a greater emphasis on the contribution that views to and from heritage assets make to their significance. It reaffirms that setting should be understood as the way in which an asset is experienced.

The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors including noise,



vibration and odour, while setting may also incorporate perceptual and associational attributes pertaining to the asset's surroundings.

This document provides guidance on practical and proportionate decision making with regards to the management of proposed development and the setting of heritage assets. It identifies that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, as well as further weighing up the potential public benefits associated with the proposals. It clarifies that changes within the setting of a heritage asset may have positive or neutral effects.

It highlights that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting and that different heritage assets may have different abilities to accommodate change within their settings without harming the significance of the asset and therefore setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, noting that any approach should be demonstrably compliant with legislation, national policies and objectives, Historic England recommend using a '5-step process' in order to assess the potential impact of a proposed development on the setting and significance of a heritage asset, with this 5-step process similar to that utilised in earlier guidance:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

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

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

**Historic England Advice Note 1 (HEAN1): Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)**

First published by English Heritage March 2011 as: Understanding Place: Conservation Area Designation, Appraisal and Management and republished as Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1 2016, Historic England Advice Note 1 (HEA): Conservation Area Appraisal, Designation and Management (Second Edition, February 2019) continues to support the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management.

This second edition updates the advice in light of the publication of the 2018 National Planning Policy Framework and gives more information on the relationship with local and neighbourhood plans and policies. It is also re-ordered, to underline the staged approach to the appraisal, designation and management of conservation areas, while continuing to offer advice on managing conservation areas so that the potential of historic areas worthy of protection is fully realised. It has also been updated to give more information on innovative ways of handling conservation appraisals, particularly community involvement beyond consultation, character assessment and digital presentation.

This document identifies different types of special architectural and historic interest which contribute to the significance and character of a conservation area, leading to its designation. These include:

- Areas with a high number of nationally designated heritage assets and a variety of architectural styles and historic associations;
- Those linked to a particular industry or individual with a particular local interest;

- Where an earlier, historically significant, layout is visible in the modern street pattern; Where a particular style of architecture or traditional building materials predominate; and
- Areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of parks and gardens of special historic interest.

Change is inevitable, and often beneficial, and this document provides guidance in respect of managing change in a way that conserves and enhances conservation areas. It also identifies ways in which suitable areas can be identified for designation as new conservation areas or extensions to conservation areas through historic characterisation studies, production of neighbourhood plans, confirmation of special interest and setting out of recommendations.

### **Historic England Advice Note 12 (HEAN12): Statements of Heritage Significance (October 2019)**

HEA12: Statements of Heritage Significance covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets.

The document states that understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions. It explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

### **Conservation Principles, Policies and Guidance (English Heritage, 2008)**

Conservation Principles outlines English Heritage's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in English Heritage's own advice and guidance through the planning process, the document is commended to local authorities to ensure that all decisions about change affecting the historic environment are informed and sustainable.

This document was published in line with the philosophy of PPS5 and is currently in the process of being updated. Nevertheless, it remains relevant to the current policy regime in that emphasis is placed upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main 'heritage values' being: evidential, historical, aesthetic and communal. The Principles emphasise that 'considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment' (paragraph 25).

### **Strategic Policy**

#### **The London Plan 2021**

The new London Plan was adopted in March 2021. The Plan forms part of the strategic Development Plan and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It replaces all previous versions of the London Plan.

The concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, underpins the new London Plan 2021, ensuring that it is focused on 'sustainable development' for future generations.

Policy D1 'London's form, character and capacity for growth' places a duty on the London Boroughs to define an area's character at a local level in order to understand its capacity for growth. Policy D1 states

that a Borough's area assessment should cover the urban form and structure the area (for example the existing townscape qualities including building height and density), as well as the historical evolution and the identification of heritage assets, including an assessment of their significance and contribution to local character. Assessments should also identify important views and landmarks.

Policy D3 'Optimising site capacity through the design-led approach' seeks every new development to make the most efficient use of land by optimising its capacity, through a 'design-led approach'. A design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that specific site. Good design and good planning are intrinsically linked, with the form and character of London's buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs of Londoners, be inclusive and make the best use of the finite supply of land. Development should be designed to respond to the special characteristics of its locality, which could include a predominant architectural styles/building material; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value. In specific regard to heritage, Policy D3 states development should 'respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character'.

Chapter 7 of the Plan sets out the relevant policies concerning development within the historic environment, stating that the built environment, combined with its historic landscapes, provides a unique sense of place within the city, whilst layers of architectural history provide an environment that is of local, national and international value. The Plan seeks to identify and promote sensitive management of London's heritage assets, in tandem with the promotion of the highest standards of architecture, maintaining the blend of old and new that contributes to the city's unique character. Policy HC1: 'Heritage conservation and growth' states:

- 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.

London is home to four UNESCO World Heritage Sites, being among the most important cultural heritage sites in the world, standing as key features of London's identity as a 'world city'. The Plan seeks to protect, conserve World Heritage Sites to promote and transmit their Outstanding Universal Value on to future generations. Policy HC2 'World Heritage Sites' states:

- A. Boroughs with World Heritage Sites, and those that are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.
- B. Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.
- C. Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.
- D. Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

Policy HC3 'Strategic and Local Views' concerns the protection of viewpoints within the city, recognising the significant contribution views make to the image and character of London at the strategic level, with the Mayor seeking to protect the composition and character of these views. Policy HC3 specifically states:

- A. Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.
- B. Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.
- C. The Mayor will also identify Strategically-Important Landmarks in the views that make a very

significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.

- D. The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.
- E. The Mayor has prepared Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.
- F. Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.
- G. Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

Policy HC4 'London View Management Framework' seeks to preserve London's Protected Vistas, requiring development to make a positive contribution and where possible enhance the viewer's ability to recognise Strategically-Important Landmarks. Policy HC4 states:

- A. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.
- B. Development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.
- C. Development proposals and external illumination of structures in the background of a view should give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well-preserved within its setting with clear sky behind, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a Strategically-Important Landmark should take into account the effects of distance and atmospheric or seasonal changes.
- D. Development proposals in designated views should comply with the following:
  - 1. London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from the panorama as a whole. The management of views containing Strategically-Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in

too close to the Strategically-Important Landmark in the foreground, middle ground or background where appropriate

2. River Prospects should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context
3. Townscape and Linear Views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.

Essentially the London Plan 2021 seeks to celebrate London's rich history, ensuring the character of an area underpins how it will grow and develop in the future. The Plan encourages the enhancement of the historic environment and looks favourably upon proposals which seek to maintain the significance and setting of the city's heritage assets.

### **Local Policy**

#### **Camden Local Plan (2017)**

The London Borough of Camden's Local Plan was adopted by the Council in July 2017. It replaced the Core Strategy and Camden Development Policies as the basis for planning decisions and future development in Camden. Chapter 7: Design and Heritage contains Policy D2: Heritage which covers the historic environment. Relevant paragraphs have been duplicated below.

'The Council will preserve and, where possible, 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

Designated 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 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:

- a. Require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- b. Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- c. Resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- d. 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:

- a. Resist the total or substantial demolition of a listed building;
- b. 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
- c. Resist development that would cause harm to significance of a listed building through an effect on its setting.