



**Kodak House
65 Kingsway
London
WC2B 6TD**

Heritage Statement

Ref: 24 1257 001

March 2024

Kodak House, 65 Kingsway, London WC2B 6TD

Heritage Statement

Ref: 24 1257 001

NGR: TQ 30582 81277

Sign-off history

issue no.	issue date	prepared by	reviewed by	approved by	reason for issue
1	27/03/2024	MS	RB	-	Draft
2	28/03/2024	-	RB	Client	Issue
3	03/04/2024	-	RB	MS	Amendment

Contents

Executive Summary	1
1 Introduction	2
1.1 Origin and scope of the report.....	2
1.2 Designated Heritage Assets.....	2
1.3 Conservation Area.....	2
1.4 Nearby Designated Assets.....	2
1.5 Non-designated assets (NDA).....	2
1.6 Setting.....	2
1.7 Aims and objectives.....	3
2 Site and Environs	4
2.1 Site.....	4
2.2 Designated Heritage Assets.....	4
2.3 Conservation Area.....	4
2.4 Archaeology.....	5
2.5 Non-designated assets (NDAs).....	5
2.6 Setting.....	6
3 Significance	7
3.1 Planning History.....	7
3.2 Change.....	7
3.3 Statement of Significance.....	8
4 Impact of Development	9
4.1 Site in general.....	9
4.2 Nearby assets.....	9
4.3 Conservation Area.....	9
4.4 Non-designated Assets (NDAs).....	9
4.5 Setting.....	9
4.6 Commentary.....	9
4.7 Harm.....	10
4.8 The Duty to Preserve or Enhance.....	10
5 Photos	11
5.1 Photos.....	11
6 Conclusions and Recommendations	13
6.1 Conclusions.....	13
6.2 Recommendations.....	13
7 Planning and Heritage Framework	14
7.1 Statutory protection.....	14
7.2 National Planning Policy Framework.....	14
7.3 Relevant Local Policy.....	17
8 Methodology	18

Figures

Figure 1: Site and Site location (Client)	3
Figure 2: Conservation Area (LBC)	5
Figure 3: Assets (LBC)	6

Note: Site outlines may appear differently on some figures owing to distortions in historic maps. North may not be up the page and is generally approximate on early maps.

Unless otherwise noted, figures are not shown to scale.

Photos

Plate 1: Timeline (Client)	11
Plate 2: General Photos (BG/Client)	11
Plate 3: GF Plan 2019 (BG/Client)	12
Plate 4: 1910 Archive (BG/Client)	12

Executive Summary

We are instructed by clients to prepare a Heritage Statement in relation to development at Kodak House, 65 Kingsway, London WC2B 6TD.

This desk-based study assesses the possible impacts of the proposed development on built and other heritage assets in the area.

Designated built heritage assets which may be affected comprise:

- The site is a Listed Building
- The site is within a Conservation Area
- The site is not a non-designated heritage asset.

Nearby designated assets include buildings in proximity, the settings of which may be affected.

Conclusions

- The site is a Listed Building (LB) Grade II.
- The site is in The Kingsway Conservation Area (CA).
- The site is not a non-designated asset (NDA).
- The site is within the vicinity of designated or non-designated heritage assets and may be within the setting of same.
- The proposal will cause no harm to the significance of any historic asset.
- It is considered that the proposal will not impact on the contribution that setting makes to the significance of nearby assets and there will be no harm.
- The proposed development would not detract from the character and appearance of the street scene and conservation area in a wider context, nor would it unduly impact upon amenity.
- By virtue of intervening suburban forms, relative disposition and lack of inter-visibility, it is considered that the setting of other designated and non-designated assets in the wider vicinity will be materially unaffected by the scheme and there will be no harm to significance.
- The proposal is considered to accord in full with legislation, national and local heritage policy and advice.

Recommendations

No further heritage reporting as required at this stage.

Rhiannon Baxendell BA (Hons) MA AssocIHBC

Director of Heritage and Archaeology
Aurora Heritage Planning Ltd

1 Introduction

1.1 Origin and scope of the report

- 1.1.1 We are instructed by clients to prepare a Heritage Statement in relation to development at Kodak House, 65 Kingsway, WC2B 6TD. (the site).
- 1.1.2 The site is in London Borough of Camden administrative area.
- 1.1.3 The proposal comprises the display of advertisements and other minor internal and external works for shop fit out.
- 1.1.4 This desk-based study assesses the impact of the scheme on built heritage assets (standing buildings). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or potential heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.5 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2023) and to standards specified by the Institute for Archaeologists (ClfA Oct 2012/Nov 2012), English Heritage (2008, 2011), Historic England (2015) and the Institute of Historic Building Conservation (IHBC 2009). The LPA has referred the applicant to the HER database.
- 1.1.6 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author, correct at the time of writing.
- 1.1.7 Archaeology is scoped out of this report.

1.2 Designated Heritage Assets

- 1.2.1 The building is listed Grade 2 and as such is a designated heritage asset.

1.3 Conservation Area

- 1.3.1 The site is within the Kingsway Conservation Area (CA). It forms part of the Holborn Central London frontage and is designated as a 'secondary frontage'.

1.4 Nearby Designated Assets

- 1.4.1 There are other listed buildings (LBs) in the vicinity; see Fig 3.

1.5 Non-designated assets (NDA)

- 1.5.1 The Council maintains a list of Buildings which make a Positive Contribution. These are considered to be non-designated assets.

1.6 Setting

- 1.6.1 The site is a designated asset and as such has a setting; it is considered that this is contiguous with the conservation area (CA).
- 1.6.2 There is nothing to suggest that appropriate change will be harmful, as a principle.

1.7 Aims and objectives

- Identify the presence of any built heritage assets that may be affected by the proposals;
- describe the significance of such assets, as required by national planning policy;
- assess the likely impacts upon the significance of the assets arising from the proposals; and
- provide recommendations for further assessment where necessary of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon heritage assets and/or their setting.

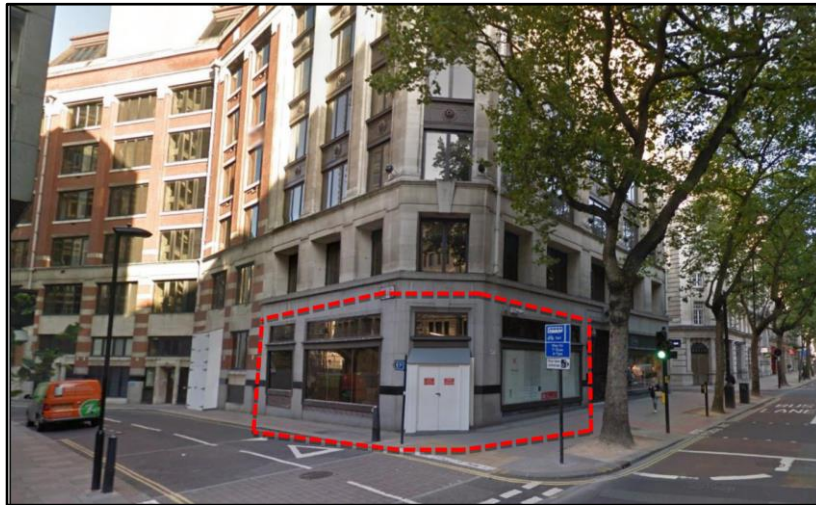


Plate 1 View from north-west (Client)



Figure 1: Site and Site location (Client)

2 Site and Environs

2.1 Site

- 2.1.1 The site comprises a six-storey mixed use building with basement and attic story on the western side of Kingsway, between Wild Court and Keeley Street. The building is Grade II listed, dating from around 1911, originally built for Kodak. It has business uses on the upper floors of retail uses at ground floor,
- 2.1.2 The building was designed by the office of Sir John Burnet.
- 2.1.3 The official list entry is KODAK HOUSE, Heritage Category: Listed Building, Grade: II, List Entry Number: 1379260.

'Office block, incorporating Nos 61 & 65. c1911. By Sir John Burnet and Partners (job architect Thomas Tait) for Kodak; later attic storey. Built by Allen Construction Co. Steel framed construction with Portland stone facing and bronze spandrel panels emphasising the method of structure. Bronze roof canopy with antefixae masks.

EXTERIOR: 6 storeys, basement and C20 attic storey. 5 window bays to main frontage, splayed 1 window corner treatment and 7 window bays to return. Windows with post 1973 glazing; originally 6 light casements with leaded panes. Plate glass ground floor frontage. Central doorway with bolection moulded surround and flanked by bronze torches. Plain stone continuous sill at 1st floor level; square-headed recessed windows. Stone pilasters between bays rise from 2nd floor level; they have bases but not capitals and lead flush into the top frieze. Coved stone cornice with band of Greek fret ornament.

INTERIOR: has good original staircases, the principal staircase to 1st floor level of marble with bronze handrail. Other features may remain behind partitioning.

HISTORICAL NOTE: an early example in London of an office block treated in a straightforward manner. Although a pioneering work of modern design it evolves from an Edwardian Neo-Classical design, stripped of almost all ornament and with a Beaux Arts axial plan. Burnet made a study tour of America in preparation for this project. The detail appears to be by Thomas Tait: despite Burnet's doubts about the lack of usual decoration, the client liked the simplicity.'

- 2.1.4 This is clearly an important building in historic and architectural terms. It has been much altered through time, including the addition of floors above the roofline. If it was more in its original state, it might have warranted a higher status.

2.2 Designated Heritage Assets

- 2.2.1 There are a number of other Listed Buildings nearby, including Africa House, The Church of the Holy Trinity, Kingsway Chambers (see Fig 2).
- 2.2.2 It is considered that the setting of these buildings will be unaffected by the proposed development and therefore are scoped out of consideration.

2.3 Conservation Area

- 2.3.1 The Site is within Kingsway Conservation Area (CA)(LBC Ref: 16), designated 16 June 1981.
- 2.3.2 There is a conservation area statement adopted 2001. This document is used in the assessment of planning applications for proposed developments in the Kingsway conservation area.

- 2.3.3 The introduction to character and appearance of the area states that *'the majority of buildings in Kingsway were constructed in a relatively short between 1919 and 1922.'* The document goes on to say that as such it provides a complete example of large-scale Edwardian architecture. Generally the buildings have shops at ground floor level with offices above.
- 2.3.4 Many of the buildings were designed with integral shopfronts and through the decades these have been the subject of considerable change.
- 2.3.5 The CA statement divides the area into character 'zones'; the site is in the Sardinia Street to Remnant Street section. The commentary notes the distinctive Kodak House (65 Kingsway) is a Portland Stone building which establishes the scale of Kingsway when approached from the south. The building has classic simplicity but has decorative detail to the roof and superb bronze entrance doors. The architectural historian Pevsner (N) in 1957 noted it as *'the only building of architectural importance in Kingsway. For here is an early example of a commercial building to which the future belonged.'*

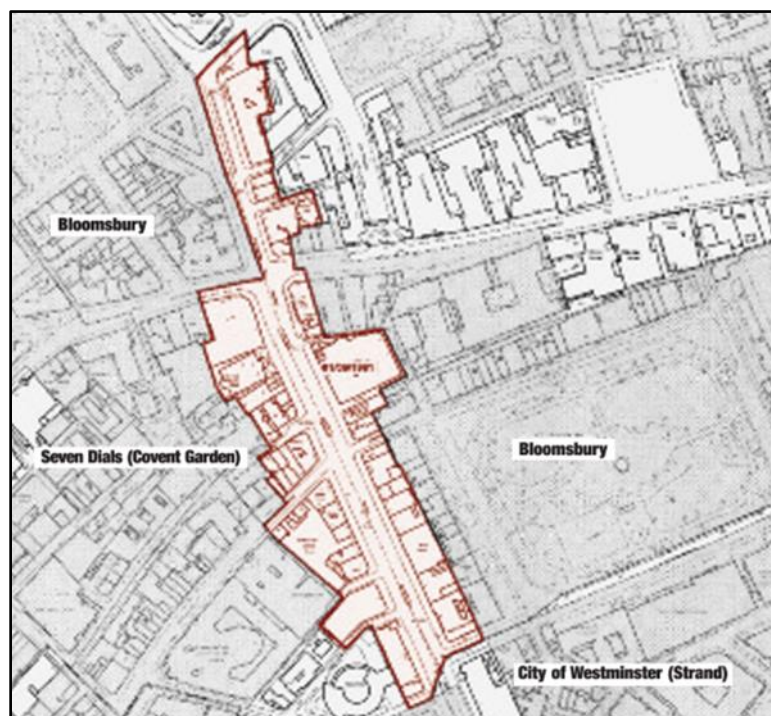


Figure 2: Conservation Area (LBC)

2.4 Archaeology

- 2.4.1 Archaeology is scoped out of this report.

2.5 Non-designated assets (NDAs)

- 2.5.1 The Council maintains a list of Buildings which make a Positive Contribution. These are considered to be non-designated assets. (see Fig 3).
- 2.5.2 NDAs in the wider vicinity have been scoped out of consideration as there will be no potential for permanent impact on the setting of these assets.

2.6 Setting

- 2.6.1 Setting is generally taken to mean 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. (NPPF 2023 Glossary).
- 2.6.2 A setting is not an asset in its own right, nor does it have significance unless part of another heritage designation.
- 2.6.3 The contribution of setting is generally considered with reference to the Historic England document Good Practice Advice in *Planning Note 3 The setting of heritage assets* (3rd edition 2020) (GPA3).
- 2.6.4 It is considered that the setting of the site and that of nearby designated and non—designated assets is contiguous with the conservation area.
- 2.6.5 The site does not feature in any identified views. Wider views are precluded by the built form; proximate views within and the prospect from the site and other assets will remain materially unaltered.



Figure 3: Assets (LBC)

3 Significance

3.1 Planning History

3.1.1 A review of the LPA website by the Client reveals the following selection of applications (not exhaustive):

Reference No.	Description	Decision
2019/1897/L	Replace 4 no. existing columns with new structural frame	Granted 29 May 2019
2018/3024/L	Refurbishment of basement space for gym with installation of mezzanine and services and removal of infill masonry	Granted 3 September 2018
2017/2090/L	External and internal alterations to the shop, including 2 externally illuminated projecting signs and internal advertising vinyls	Granted 26 May 2017
2016/6969/L	Various internal alterations to 4th floor offices	Granted 2 February 2017
2015/4654/L	Reinstatement of external door on south-east corner of building; provision of new entrance to basement on Keeley Street elevation and internal alterations in association with a change of use of part of ground floor and part of basement	Granted 21 December 2017
2015/4096/P	Change of use of part of ground floor from office use (Class B1a) to retail use (Class A1) and change of use of part of the basement from office use (Class B1a) to a mixed use of retail (Class A1), restaurant/cafe (Class A3), drinking establishment (Class A4) and assembly and leisure (Class D2); reinstatement of external door on south-east corner of building; provision of new entrance to basement on Keeley Street elevation; and associated works	Granted 21 December 2015
2015/2748/L	Internal refurbishment of existing offices at basement, ground, first and second floors	Granted 15 July 2017
2011/5860/P	Installation of louvre grille to the fanlight of front entrance doors at ground floor level Wild Court, retail unit (Class A1).	Granted 6 February 2012
2011/5855/L	Works in association with the installation of louvre grille to the fanlight of front entrance doors at ground floor level Wild Court, retail unit (Class A1).	Granted 6 February 2012
2010/4844/P	Retention of 3 x air-conditioning condenser units, and associated pipe work, to roof of office building (Class B1)	Granted 14 December 2010
2010/0797/L	Installation of 3 x air conditioning condenser units to existing roof, including additional service runs within the 6th and 7th floor levels	Granted 3 August 2010
2010/0795/P	Installation of 3 x air conditioning condenser units to roof of office building (Class B1)	Refused 3 August 2010
PS9704664	Removal of bronze anodised aluminium windows, infilling of old window apertures with yellow stock bricks and rendered masonry to match existing surrounds	Granted 11 September 1997
8600977	The erection of an additional floor at 7th floor level and its use for offices	Granted 14 August 1986
8600847	Conversion of a loading bay into office accommodation and the re-siting of an existing shop unit	Granted 30 July 1986

3.1.2 It is concluded that appropriate change, within the guidance provided by the conservation area statement and policy, is acceptable in principle.

3.2 Change

3.2.1 The site is in a CA. The assessment document notes that there has been relatively little change through time, with the majority of that change being in detail and mostly ground floor level. Organic and incremental change is an integral part of the character of a mature conservation area, and this is likely to continue.

3.2.2 Under the heading 'Guidance' paragraphs K 16 to K 19 inclusive offer advice on shopfronts and advertisements. In particular K 19 states that '*shop signs should be appropriate for the conservation area, respecting the proportions of the shop frontages*

and maintaining the division between units. In Kingsway and Hoborn with character deriving from predominantly 20th-century development, internally illuminated box signage may be acceptable if the depth and bulk are appropriate in scale and with fret cut or halo-lit lettering.'

- 3.2.3 Reference is also made to the need for planning permission, listed building consent and advertisement consent as appropriate. The council provides further, more general advice in Supplementary Planning Guidance (SPG).

3.3 Statement of Significance

- 3.3.1 The determination of the significance of historic assets is based on statutory designation and/or professional judgement against 4 'values' (English Heritage/Historic England - 2008/2015) restated in the advice document GPA 2 - *Managing Significance in Decisions*.

- 3.3.2 The 4 values are:

- Evidential value
- Aesthetic value
- Historical value
- Communal value

(This is refined by National Planning Policy Guidance (PPG), last updated in September 2023).

- 3.3.3 The site is a Grade II Listed Building, by a known architect, part of a planned group from a very distinct period of time, conceived to make a statement whilst allowing freedom of expression by the various architects. Kodak house has extensive evidential, aesthetic and historical value; communal value is limited to the fact of public access the ground floor, revealing the significance of the asset. It is considered to be of **high significance**.



Figure 4: Kodak House (LBC)

- 3.3.4 Nearby LBs are of similarly **high significance**; however, setting makes little if any contribution to that significance over and above the collective character of the conservation area.
- 3.3.5 Nearby NDAs are of **low significance**; setting makes little if any contribution to that significance over and above collective character of the conservation area.

4 Impact of Development

4.1 Site in general

- 4.1.1 The proposal (PL/0873/23) comprises the installation of four signs, two internally and two externally. The external signage will measure 600 mm x 600 mm and will be non-illuminated. They will be positioned on slimline brackets to the Kingsway and Keeley Street frontages and will be of traditional proportions (details to be agreed).
- 4.1.2 There will also be some minor internal works, consisting of the installation of two illuminated internal signs and a shop fit-out - as detailed on the submitted drawings.
- 4.1.3 Internally, the proposals involving the shop fit-out would help secure a long-term viable use for the unit. Little of the interior is of any merit, having been adapted over the years for many and all various commercial uses. The unit is essentially a concrete shell. These minor internal works would preserve the heritage asset, retaining the plan form and all principal openings.
- 4.1.4 The above development will result in change, but no permanent impact on any heritage asset and consequently no harm to significance.
- 4.1.5 Please refer to the supporting documents for comprehensive details.

4.2 Nearby assets

- 4.2.1 There are designated and non-designated heritage assets within the immediate vicinity of the site but by virtue of intervening urban forms and the scale of the proposed works there will be change to the contribution of setting and therefore no harm to significance.
- 4.2.2 The development won't feature in any long distance or identified key views, therefore will not affect the setting of LBs/NDAs in the wider vicinity, resulting in a visually neutral impact.

4.3 Conservation Area

- 4.3.1 The site is within Kingsway conservation area. Proposed internal alterations and signage will have no material nor permanent impact; there will be no harm to significance.

4.4 Non-designated Assets (NDAs)

- 4.4.1 Nearby NDAs/locally listed buildings in the vicinity have been scoped out of consideration. There will be no harm to significance of any other asset.

4.5 Setting

- 4.5.1 It is considered that the setting of the site is contiguous with the conservation area; the proposal will not materially impact on the contribution that is made to the significance of the site.
- 4.5.2 By virtue of lack of intervisibility, relative disposition and intervening urban forms have no material impact on the setting of any other assets and no harm will be caused to significance.

4.6 Commentary

- 4.6.1 There has been change over time - clearly the significance of assets remains unharmed; there is nothing to suggest that a watershed has been reached. The development subject to this application does not take on-going change beyond

the tipping point.

- 4.6.2 Change is part of the character of most long-standing conservation areas, as is the case here.

4.7 Harm

- 4.7.1 The NPPF, at paras 201 & 202, refers to harm to the significance of designated heritage assets. At para 203 it refers to NDAs.
- 4.7.2 It is considered that the proposal will cause no harm to the significance of any asset; there will be change, but overall that change will be in the positive and better reveal the significance of the asset. As there is no harm there is no duty to prove public benefit, etc.
- 4.7.3 Overall, the proposal will represent an enhancement through use of sensitive materials and appropriate, well-considered design.

4.8 The Duty to Preserve or Enhance

- 4.8.1 The Act imposes a duty to preserve and/or enhance the character and/or appearance of the conservation area. Whereas it is not possible to both preserve and change - by definition - it is generally considered that preserve equals 'to do no harm'.
- 4.8.2 It is considered that the proposal overall will preserve the character and enhance the appearance of the conservation area. The impact will be in the positive.

5 Photos

5.1 Photos

5.1.1 This section contains photographs to provide context, they are not extensive. Please refer to the supporting documents for additional photos.

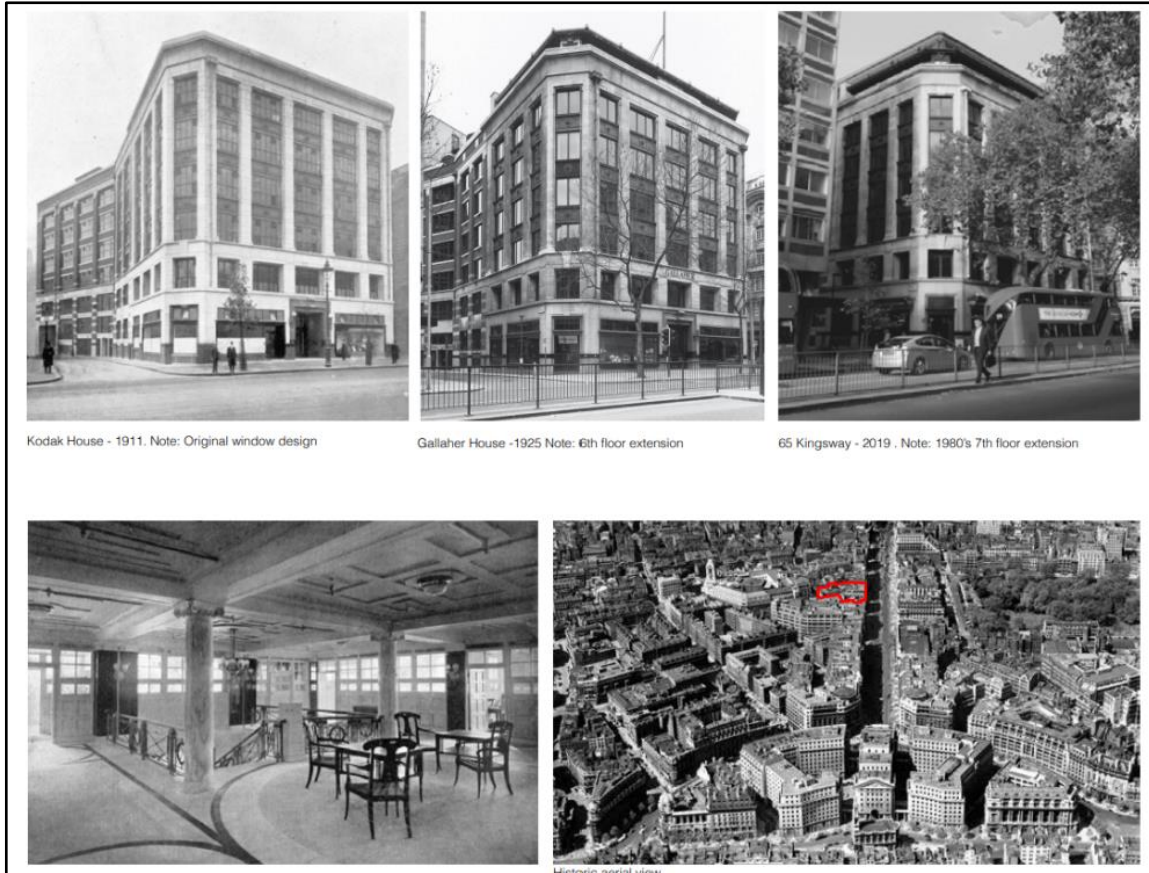


Plate 2: Time line (Client)

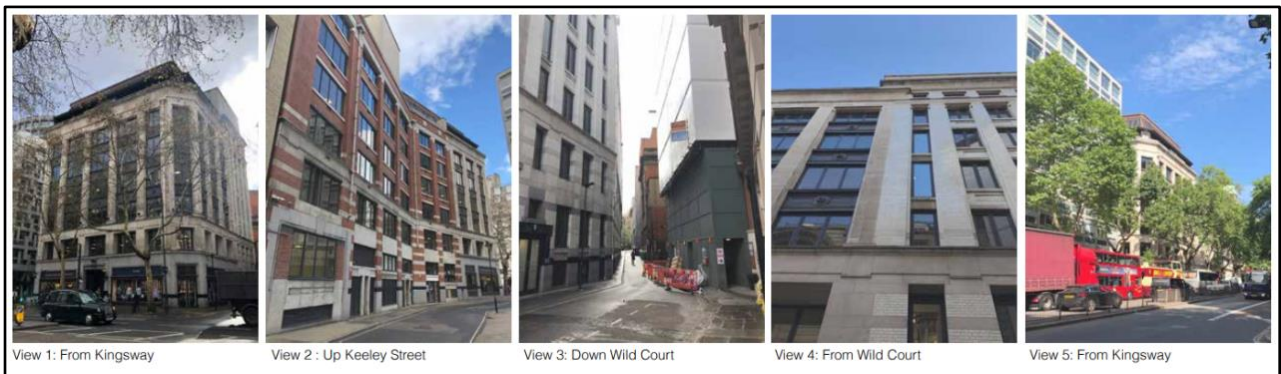
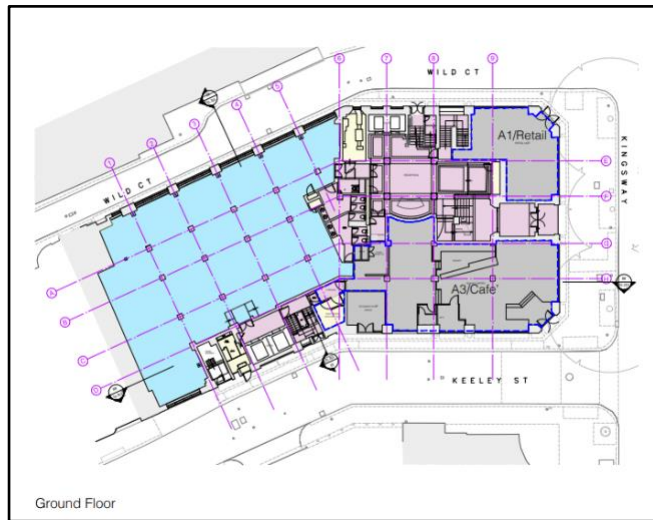


Plate 3: General Photos (BG/Client)



Ground Floor

Plate 4: GF Plan 2019 (BG/Client)



1910 Archive Kingsway Elevation

Plate 5: 1910 Archive (BG/Client)

6 Conclusions and Recommendations

6.1 Conclusions

- 6.1.1 The site is a Listed Building (LB).
- 6.1.2 The site is in a Conservation Area (CA).
- 6.1.3 The site is not a non-designated asset (NDA).
- 6.1.4 The site is within the near vicinity of designated and non-designated heritage assets. Setting is considered to be contiguous with the conservation area.
- 6.1.5 It is considered that the proposals will not impact on the contribution that setting makes to the significance of nearby assets and there will be no harm.
- 6.1.6 The proposed development will not detract from the character and appearance of the street scene and area in a wider context, nor would it unduly impact upon amenity.
- 6.1.7 By virtue of intervening suburban forms, relative disposition and lack of inter-visibility, it is considered that the setting of other designated and non-designated assets in the wider vicinity will be materially unaffected by the scheme and there will be no harm to significance.
- 6.1.8 The proposal is considered to accord in full with legislation, national and local heritage policy and advice.

6.2 Recommendations

- 6.2.1 No further heritage reporting as required at this stage.

Rhiannon Baxendell BA (Hons) MA AssocIHBC

Director of Heritage and Archaeology
Aurora Heritage Planning Ltd

7 Planning and Heritage Framework

7.1 Statutory protection

Listed Buildings and Conservation Areas

- 7.1.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

7.2 National Planning Policy Framework

- 7.2.1 The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). This advice was updated in 2023.
- 7.2.2 One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to '*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.*' It recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be considered.
- 7.2.3 Section 16: Conserving and Enhancing the Historic Environment sets out the heritage-related consent regimes for which local planning authorities are responsible under the *Planning (Listed Buildings and Conservation Areas) Act 1990*, as well as to plan-making and decision-making.
- 7.2.4 Paras 189 – 208 inclusive refer:
189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- (Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance).*
190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
- the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and
 - opportunities to draw on the contribution made by the historic environment to the character of a place.
191. 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.

192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

7.2.5 Proposals affecting heritage assets are considered under para 194 on:

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. 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.

196. 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.

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

7.2.6 Potential impacts are considered in para 199 on:

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. 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.

(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.)

201. 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.

202. 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.

203. 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.

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

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

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

206. 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.

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

208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but

which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

7.3 Relevant Local Policy (Please see Client's cover letter)

Development Plan Core Strategy

Development Plan Policies

Conservation Area Assessment and Guidance

Design SPG

The London Plan

8 Methodology

- 8.1.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):
- **Evidential value:** the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
 - **Aesthetic value:** this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
 - **Historical value:** the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
 - **Communal value:** this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.
- 8.1.2 The tables below are used throughout this report to determine significance and impacts. Table 1 is used to assess significance, with magnitude of impact determined using Table 2. Table 3 consolidates the results from both Tables 1 and 2 to determine overall heritage impact. If you

VERY HIGH	<ul style="list-style-type: none"> · World Heritage Sites · Other buildings of recognised international importance
HIGH	<ul style="list-style-type: none"> · Scheduled Ancient Monuments with standing remains · All Grade I and all Grade II* Listed Buildings · Some Grade II listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in their listing grade · Conservation Areas containing very important buildings · Undesignated structures of clear national importance
MEDIUM	<ul style="list-style-type: none"> · Some Grade II Listed Buildings · Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations · Conservation Areas containing buildings that contribute significantly to its historic character · Historic townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g., including street furniture and other structures)
LOW	<ul style="list-style-type: none"> · Locally listed buildings · Historic (unlisted) buildings of modest quality in their fabric or historical association · Historic townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g., including street furniture and other structures)
NEGLIGIBLE	· Buildings of no architectural or historical note

Table 1: Assessment of Significance. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

HIGH	Changes to most or all of the key archaeological or key heritage baseline elements, or comprehensive changes to the setting of such key features that lead to total or almost complete alteration of a features' physical structure, dramatic visual alteration to the setting of a heritage asset, or almost comprehensive variation to aspects such as noise, access, or visual amenity of the historic landscape.
MEDIUM	Changes to many key archaeological materials/historic elements, or their setting, such that the baseline resource is clearly modified. This includes considerable visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, and considerable changes to use or access changes to key historic landscape elements.
LOW	Detectable impacts which alter the baseline condition of an archaeological or heritage receptor to a slight degree – e.g., a small proportion of the surviving heritage resource is altered; slight alterations to the setting or structure, or limited changes to aspects such as noise levels, use or access that results in limited changes to historic landscape character.
NEGLIGIBLE	Barely distinguishable change from baseline conditions, where there would be very little appreciable effect on a known site, possibly because of distance from the development, method of construction or landscape or ecological planting, that are thought to have no long-term effect on the historic value of a resource.
UNKNOWN	Extent / nature of the resource is unknown and the magnitude of change cannot be ascertained.

Table 2: Magnitude of Impact. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

MAGNITUDE OF IMPACT	SIGNIFICANCE OF HERITAGE ASSET				
	VERY HIGH	HIGH	MEDIUM	LOW	NEGLIGIBLE
No Change	Neutral	Neutral	Neutral	Neutral	Neutral
Negligible	Slight	Slight	Neutral/Slight	Neutral/Slight	Neutral
Low	Moderate/Large	Moderate/Slight	Slight	Neutral/Slight	Neutral/Slight
Medium	Large/Very Large	Moderate/Large	Moderate	Slight	Neutral/Slight
High	Very Large	Large/Very Large	Moderate/Large	Slight/Moderate	Slight

Table 3: Heritage Impact. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)