

184-192 Drummond Street  
London, NW1 3HP

Heritage Statement

February 2025

Consultancy for the  
Historic Built Environment

KMIHeritage

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## 1 Introduction

1.1 This Heritage Statement has been prepared by KM Heritage on behalf of British Land in support of a proposal for 184-192 Drummond Street, London, NW1 3HP ('the site').

1.2 This report should be read in conjunction with the accompanying drawings and Design & Access Statement prepared by Arup as well as other application documents.

### The Proposed Development

1.3 The site is a Locally Listed building situated within the London Borough of Camden.

1.4 Planning permission is sought for:

“Installation of new bin store enclosure, creation of new entrance with level access and replacement of existing glazing on west elevation at ground floor level of 184-192 Drummond Street.”

### Purpose

1.5 The purpose of this report is to assess the proposed scheme against national and local policies and guidance relating to the historic built environment.

### Organisation

1.6 This introduction is followed by a description of the history of the site and its heritage significance in Section 2. Section 3 sets out the relevant national and local policy and guidance relating to the historic built environment. An analysis is provided in Section 4 of the proposed scheme and its potential effect in heritage terms. Section 5 examines the proposal in terms of policy and guidance, and Section 6 is a summary and conclusion.

### Authorship

1.7 The author of this report is Anne Roache MA MSc. Anne is a built environment conservation professional who began her career at Jones Lang LaSalle and went on to gain broad experience working for leading commercial organizations in the fields of property, planning and law. She specialises in the architectural and social history of London.

## 2 The site and its surroundings

2.1 This section of the report describes the history and development of the site and its surroundings.

### Summary description

2.2 The site, 184-192 Drummond Street, is a Locally Listed, 5-storey (plus basement) brick faced building located at the corner where Drummond Street and Stanhope Street meet. The building was constructed in the early part of the 20th century as a furniture warehouse but suffered war time damage and so only a small part of its original fabric survives. It was later converted into office accommodation and underwent a major refurbishment in the 2000s.

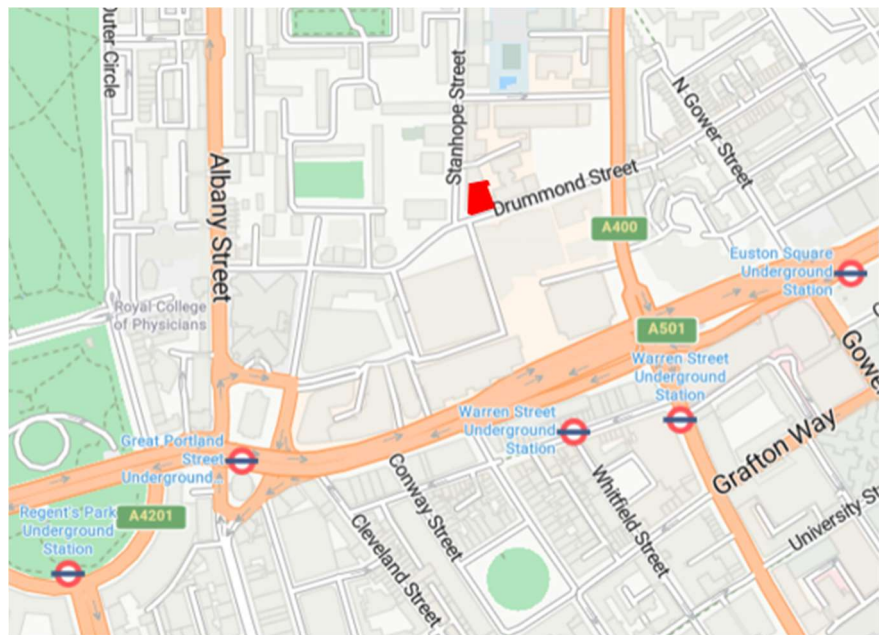


Figure 1: The Site in context

### Historical development of the site

2.3 The site was originally a large warehouse building completed at some point between the publication of the 1895 OS map and the 1915 OS map (fig. 2<sup>1</sup>). It replaced a number of individual homes and business premises, some of which are shown by directory evidence as being occupied by small furniture manufacturers and allied trades. In 1871, these included

<sup>1</sup> London - London VII.42 Revised: 1893 - 1895, Published: 1895 / London (1915- Numbered sheets) V.5 Revised: 1914, Published: 1916

cabinet maker Antonio Lochmüller at 46 Stanhope Street, and William Parlett, chair & sofa maker at 42 Stanhope Street.<sup>2</sup> Furniture manufacturing had become well established in this part of Camden during the latter part of the 19th century, supplying high-end retailers in central London including Maples (later Waring & Gillow) and Heals which were both located on the nearby Tottenham Court Road.

- 2.4 It may be assumed that the original building – noted as being ‘furniture works’ in the 1953 OS (fig. 3<sup>3</sup>) – was constructed a purpose built furniture manufactory, warehouse or showroom incorporating the business’ back office functions.



Figure 2: OS 1895 (extract) / OS 1916 (extract)



Figure 3: LCC Bomb Damage Map / OS map 1953 (extract)

<sup>2</sup> London Post Office Directory 1871

<sup>3</sup> Layers of London / TQ2982SW – A Surveyed: 1951, Published: 1953

- 2.5 The site was badly damaged by bombing during the Blitz of the Second World War. The LCC Bomb damage map (1945) colours the site purple indicating 'damaged beyond repair'. To the north, terraced properties were coloured green for 'clearance' indicating sites to be redeveloped, however as is evidenced today, full clearance was not carried out and Nos. 60-48 Stanhope Street were retained. The Site was rebuilt behind a remnant of the retained façade – i.e. three bays on Stanhope Street - and continued as a furniture manufacturing workshop as noted on the 1953 OS map (fig. 3<sup>4</sup>).
- 2.6 Historically Stanhope Street ran all the way south to Euston Road and Drummond Street stopped where it met Stanford Street. Redevelopment during the 1960s changed the shape of the junction where Drummond Street, Stanhope Street met a rerouted Longford Street which now ran through the site of the former Regent's Park Central Power Station. This was demolished along with some adjacent houses and the present Westminster Kingsway College building erected. The southern section of Stanhope Street became what is now known as Triton Square.
- 2.7 The post war period saw the slow decline of many of London's traditional manufacturing businesses such as furniture making, and those which survived relocated to larger premises outside of central London. By the last quarter of the 20th century, the site, like many by then redundant warehouse buildings, was converted into office use.

#### The heritage context of the site

- 2.8 The heritage context of the site has been established through a search of the Greater London Historic Environment Record (GLHER), the National Heritage List for England and resources provided by the London Borough of Camden, as well as other relevant archives and sources.
- 2.9 In order to establish the heritage baseline, a search was undertaken to identify above ground heritage assets within c.100m of the centre of the site (fig. 4<sup>5</sup>). Given the existing topography, townscape character and the minor nature of the proposal, it was judged that this would be an appropriate area to examine.

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<sup>4</sup> Layers of London / TQ2982SW – A Surveyed: 1951, Published: 1953

<sup>5</sup> LB Camden

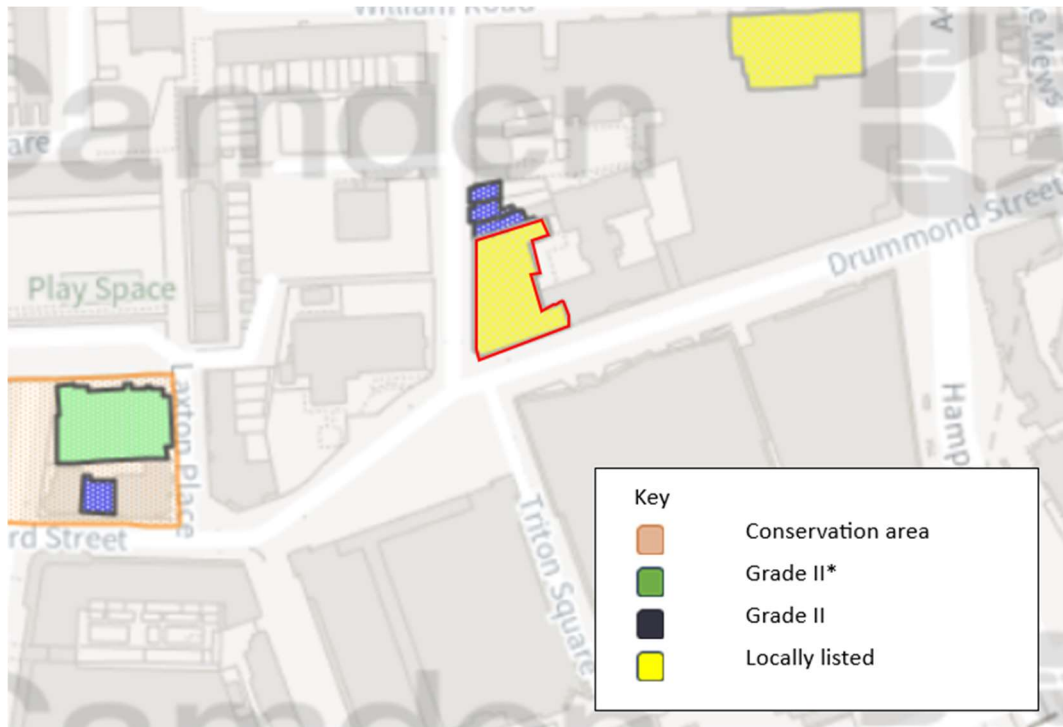


Figure 4: Heritage Assets in the vicinity of the site (outlined in red)

Conservation areas

2.10 The site is not located within a Conservation Area. The closest conservation area is Regent’s Park with part of its boundary lying c.100m, to the west of the site (fig. 4).

Listed buildings

2.11 Buildings and structures are listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for their special architectural or historic interest.

2.12 There are no listed buildings on the site. The following Grade II Listed buildings are located immediately adjacent to the site:

- Stanhope Street, No. 48: former Lord Nelson Public House, c.1889 with later alterations. Now vacant;
- Stanhope Street, No. 50: terraced house of c.1804. Three storeys over basement. Stucco front with weatherboarded ground floor over remnant of former shopfront in the shape of pilasters carrying entablature with dentil cornice;



- Stanhope Street, No. 52: terraced house of c.1804. Three storeys over basement, traditional stock brick front and sash windows.

2.13 In addition the following listed buildings lie c.100m to the west of the site but have no intervisibility with it (fig. 4):

- Grade II\*: Church of St Mary Magdalene<sup>6</sup> 1849-52 with later alterations;
- Grade II: St Mary Magdalene School Annexe<sup>7</sup>, 1901 by E.R. Robson.

#### Non-designated heritage assets

2.14 National Planning Policy Guidance defines a 'non-designated heritage assets' as buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

2.15 Camden defines its Local List<sup>8</sup> as containing 'elements of the historic environment that are not already designated but which nonetheless contribute to a sense of place, local distinctiveness and civic pride.'

2.16 The site – No. 84-192 Drummond Street and 40-46 Stanhope Street - is included on Camden's Local List as having both architectural and townscape significance. The site is describes as:

'early to mid-20th century office building on corner of Drummond Street and Stanhope Street. Of 5 storeys, in stock brick with horizontal linear bands of windows creating a striking street presence and clearly marking this corner site.'

2.17 The following Locally Listed building lies c.100m to the north east of the site:

- William Road, Nos. 7 to 15: early 20th century commercial building (possibly 1910-20) with central entrance bay.

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<sup>6</sup> NHLE List entry number: 1113157

<sup>7</sup> NHLE List entry number: 1379349

<sup>8</sup> Camden's Local List 2015: [www.camden.gov.uk/local-list](http://www.camden.gov.uk/local-list)

## Heritage significance

### *Assessing heritage significance: concepts and terminology*

- 2.18 Listed buildings and conservation areas are ‘designated heritage assets’, as defined by the National Planning Policy Framework (the NPPF). Other buildings and structures identified as having heritage significance can be considered as ‘non-designated heritage assets’, and this includes Locally Listed buildings.
- 2.19 Heritage ‘significance’ is defined in the NPPF as  
‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting’.
- 2.20 The Historic England ‘Historic Environment Good Practice Advice in Planning Note 2’ puts it slightly differently – as ‘the sum of its architectural, historic, artistic or archaeological interest’.
- 2.21 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.
- ‘Architectural interest’, ‘artistic interest’ or ‘aesthetic value’*
- 2.22 The NPPF describes how a building may have ‘architectural’ and ‘artistic interest’ in varying degrees. ‘Conservation Principles’ applies the term ‘aesthetic value’. In respect of design, ‘Conservation Principles’ says that ‘design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship’.
- 2.23 The Site is a 5-storey (plus basement) steel framed building faced in stock brick. The building is large, with 6 wide bays to Drummond Street and 8 bays to Stanhope Street. The main access is on the chamfered corner where Drummond and Stanhope Streets meet and there are further, subsidiary, entrances on both streets. The monotony of the simple, undecorated elevations is lightened by the generous fenestration comprising of slim-profiled metal-framed windows which create a horizontal emphasis across the building façades.

- 2.24 The Drummond Street elevation is of entirely post-war construction. The Stanhope Street elevation is a marriage of original and new with the three northernmost bays of the Stanhope Street elevation being the surviving part of the original pre-war façade. On closer inspection it is clear to see where the post and pre-war façades meet with the brickwork and window design - although very similar in colour (yellow stock), style (large, metal framed and multi-paned) and orientation (horizontal) - being clearly different in origin.
- 2.25 The original balance of the Stanhope Street elevation was greatly altered post-war and is far from pristine. Below the southernmost ground floor window of the pre-war façade is brick infill indicating that either that there would have originally been a door opening here or it may be blast damage repair. The ground floor windows are both timber-framed whereas those in the upper floors are metal framed. All are likely to be post-war replacements given the level of blast damage that the building sustained.
- 2.26 Internally the site is post-war fabric and has no heritage significance
- 2.27 The proposal will alter only one ground floor bay in the pre-war façade and replace a modern window in the post-war section.
- 'Historic interest' or 'Historical value' and 'Evidential value'*
- 2.28 The site holds vestigial historical or evidential value in its former use within the furniture trade which once thrived in this part of Camden, in evidential terms there is very little of the original building remaining .
- Setting*
- 2.29 The setting of a heritage asset is defined in the NPPF as:  
 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.<sup>9</sup>
- 2.30 The site lies adjacent to three listed buildings spanning the length of the 19th century. Each of these buildings has undergone changes not only in themselves but in their setting has changed dramatically since they were first constructed.

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<sup>9</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

Fiest, with the construction of the Regent's Park Central Power Station in 1890, then with the construction of the site itself in the early 20th century, and again, dramatically, during the post-war period with large scale site clearances and the erection of residential estates and tower blocks and along with a concomitant loss of original street pattern.

- 2.31 In terms of Historic England's 'Conservation Principles', the site and its surroundings provide us with '*evidence about past human activity*'. By means of their fabric, design and appearance they are a physical record of social and economic change and lifestyles, telling the story of how the area evolved over an extended period of time. The site's surroundings also possess historic interest by virtue of the area's significance as a part of the northern expansion of London during the late 18th and early 19th century, the impact of the arrival of the railway upon the built environment and economy, the underlying urban grain, and the historical value of surviving heritage assets (Listed and Locally Listed buildings as noted above).
- 2.32 The key contributing elements of the aesthetic significance of the area as a piece of historic townscape are the nature of older (listed and unlisted) structures and their contribution to the historic streetscape. The site and the surviving early 19th century terraced houses at Nos. 60 & 62 Stanhope Street, continue to speak of an earlier townscape setting thereby helping to support the elements of significance of the listed buildings that are derived from setting. One aspect of setting by which the present site does not contribute positively however, is in the arrangement of large refuse bins on the pavement outside it and this element that should be addressed.

#### Summary

- 2.33 The site is Locally Listed. It holds a degree of architectural interest in its strong, unadorned form, redolent of early to mid-20th century commercial architecture. It also holds townscape significance by virtue of its location at the corner of Drummond and Stanhope Street which affords it a strong street presence.
- 2.34 The site falls within the immediate setting of three listed buildings - Nos. 48-52 Stanhope Street – which although it does not share an architectural language or contemporaneous construction, does have a support relationship in terms of setting in its reflection of an earlier streetscape before later 20th century changes.

### 3 The legislative, policy and guidance context

#### Introduction

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

3.2 Section 5 demonstrates how the proposed scheme complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 5: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surrounding, and in reaching conclusions about the effect of the proposal.

#### The Planning (Listed Buildings and Conservation Areas) Act 1990

3.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). The following section is relevant in this case:

Section 66(1): In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

#### The National Planning Policy Framework

3.4 The National Planning Policy Framework (NPPF) was first published in 2012 with the most recent update being published on 12 December 2024.<sup>10</sup>

3.5 Chapter 16 of the National Planning Policy Framework: 'Conserving and enhancing the historic environment' deals with Heritage Assets describing them as 'an irreplaceable resource' that '*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution*

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<sup>10</sup> First published on 27 March 2012 and updated on 24 July 2018, 19 February 2019, 20 July 2021, 5 September 2023, 19 December 2023 and 12 December 2024. Ministry for Housing, Communities and Local Government (2024) National Planning Policy Framework. Online: [www.gov.uk/guidance/national-planning-policy-framework](http://www.gov.uk/guidance/national-planning-policy-framework)

*to the quality of life of existing and future generations'*  
(paragraph 202).<sup>11</sup>

- 3.6 Paragraphs 203-206 discuss the responsibilities of the local authority towards plan making and the historic environment.  
Proposals affecting heritage assets
- 3.7 Paragraph 207 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says that:  
  
‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’
- 3.8 In terms of the local authority, paragraph 208 requires that they:  
  
‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.’
- 3.9 Further: ‘where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision’ (paragraph 209).
- 3.10 Paragraph 210 says that ‘In determining applications, local planning authorities should take account of:  
  
a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;  
  
b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

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<sup>11</sup> The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

c) the desirability of new development making a positive contribution to local character and distinctiveness.’

- 3.11 Paragraph 211 adds ‘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’.

*Considering potential impacts*

- 3.12 Paragraph 212 advises local planning authorities that ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

- 3.13 Paragraph 213 continues: ‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’<sup>12</sup>

- 3.14 In terms of proposed development that will lead to substantial harm to (or total loss of significance of) a designated heritage asset, paragraph 214 states that ‘local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

(a) the nature of the heritage asset prevents all reasonable uses of the site; and

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<sup>12</sup> Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

- (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - (c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
  - (d) the harm or loss is outweighed by the benefit of bringing the site back into use.’
- 3.15 It continues ‘where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’ (paragraph 215).
- 3.16 In considering the effect of an application on the significance of a non-designated heritage asset, the local authority should employ a ‘balanced judgement’ in regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 216).
- 3.17 Paragraph 217 requires that ‘Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred’.
- 3.18 Where a heritage asset is to be lost, the developer will be required to ‘record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible’ (paragraph 218).<sup>13</sup>
- 3.19 In terms of development within the setting of heritage assets, paragraph 219, advises 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. 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’.
- 3.20 It goes on however that ‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation

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<sup>13</sup> Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.



Area or World Heritage site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage site as a whole' (paragraph 220).

3.21 Finally, paragraph 221 requires that the onus will be on local planning authorities to 'assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies'.

3.22 The setting of a heritage asset is defined in the NPPF as:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.<sup>14</sup>

#### Planning Practice Guidance

3.23 Planning Practice Guidance<sup>15</sup> provides streamlined guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled 'Conserving and Enhancing the Historic Environment'. It is subdivided into sections giving specific advice in the following areas:

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

3.24 PPG discusses the setting of heritage assets as follows:

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<sup>14</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

<sup>15</sup> Ministry of Housing, Communities and Local Government, Online: [www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment](http://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment)

'The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the Proposed scheme and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.'

Historic England's Planning Advice<sup>16</sup>

*Good Practice Advice*

- 3.25 The guidance provide 'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG)'.

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<sup>16</sup> Historic England, *The Planning System*, Online: [historicengland.org.uk/advice/planning/planning-system](http://historicengland.org.uk/advice/planning/planning-system)

3.26 These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);
- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017);
- GPA 4: Enabling development and heritage assets (2020).

*GPA 3: The Setting of Heritage Assets*

3.27 This note provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting.

3.28 The guidance echoes the definition of ‘setting’ in the NPPF as ‘the surroundings in which [the asset] is experienced’ and continues: ‘its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’.

3.29 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed scheme on that significance. The document then sets out how the step-by-step methodology is used and considers each step in more detail.

*Historic England Advice Notes*

3.30 This set of advice notes covers various planning topics in more detail and at a more practical level.<sup>17</sup> The documents most relevant to the proposed scheme are:

3.31 The documents most relevant to the proposal are:

- HEAN 7 - Local Heritage Listing;
- HEAN 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets.

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

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<sup>17</sup> Historic England Advice Notes: [historicengland.org.uk/advice/planning/planning-system](https://historicengland.org.uk/advice/planning/planning-system)

- 3.32 This document<sup>18</sup> has been referred to in Section 3 of this report. Its stated aim is primarily to help English Heritage – now Historic England - to ensure consistency of approach in carrying out their role as the Government’s statutory advisor on the historic environment in England.

#### The London Plan

- 3.33 The London Plan 2021 was adopted in March 2021. It is the overall strategic plan for London, and sets out an integrated economic, environmental, transport and social framework for the development of the city over the next 20-25 years
- 3.34 In terms of development proposals, Policy HC1 ‘Heritage conservation and growth’, says that:

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

#### Camden's Local Plan

- 3.35 The London Borough of Camden adopted its Local Plan in July 2017.<sup>19</sup>
- 3.36 Section 7 of the Local Plan deals with Design and Heritage saying that ‘the Council places great importance on preserving the historic environment’.
- 3.37 Policy D2 ‘Heritage’ deals with Camden’s heritage assets.
- 3.38 In relation to Listed Buildings the policy says:

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

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

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<sup>18</sup> English Heritage (2008) *Conservation principles, policies and guidance for the sustainable management of the historic environment*.

<sup>19</sup> LB Camden is in the process of preparing a new local plan and consulted on the draft new Local Plan from 17 January to 13 March 2024. An updated version for further consultation will be published later in 2024.

j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and

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

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

'The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.'

## 4 The proposed scheme and its effect

### Introduction

- 4.1 This section of the report assesses the proposed scheme and its possible effect upon the heritage significance and townscape character of the surrounding context described earlier in this report.

### The proposed scheme

- 4.2 Planning permission is sought for:

“Installation of new bin store enclosure, creation of new entrance with level access and replacement of existing glazing on west elevation at ground floor level of 184-192 Drummond Street.”

- 4.3 The proposal is fully described in the drawings and Design & Access Statement, and in other application documents.
- 4.4 The proposal will alter only one ground floor bay in the pre-war façade of the Stanhope Street elevation and replace a modern window in the adjacent post-war section (figs. 5 & 6).
- 4.5 It is proposed to introduce a new level access entrance on Stanhope Street by (re)opening the southernmost ground floor window of the retained façade. This new entrance will balance the existing doorway to the north. It will be recessed by 400mm to be in line with the existing door and the brick surround will be constructed to replicate the stepped-in edge of the existing doorway. It will incorporate the steel beam above the existing window and will utilise a burnished metal frame to match the treatment of the existing metal-framed windows above.
- 4.6 A modern ground floor window in the adjacent post-war section will be replaced by a double-glazed unit to improve levels of occupier comfort as well as sustainability. The design will match the existing.
- 4.7 A low-key and contextually sensitive bin enclosure will provide a permanent solution to the existing on-street bin storage, which is an eyesore and detracting to the setting of the adjacent listed buildings.



Figure 5: West elevation existing

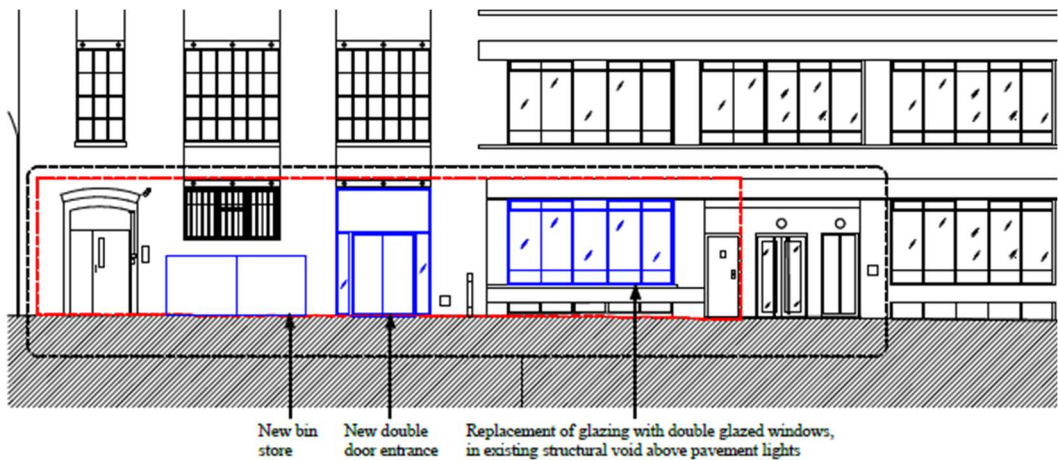


Figure 6: West elevation proposal

#### Effect on heritage significance

- 4.8 The site is Locally Listed and there will be a direct effect upon the site.
- 4.9 The site lies within the setting of designated and non-designated heritage assets.
- 4.10 The proposal has been informed by a careful study of the building's history and context, including a review of earlier phases of alterations which have affected its original fabric and character and the effect of such works upon elements of its heritage significance. Given the importance of the external

appearance of the Locally Listed building and the role it plays in the setting of the adjacent listed buildings, particular attention has been paid to supporting and sustaining its character and appearance.

- 4.11 The proposal includes the sensitive remodelling of one ground floor window to create new access. The proposal will avoid harm to the building's local significance whilst enabling the delivery of accessible office accommodation. The proposal also offers an opportunity to fix a key and problematic element of having on-street waste storage by creating a modest bin enclosure with the aim of improving the character and appearance of the Locally Listed building and the setting of the adjacent listed buildings.
- 4.12 The interventions will be carried out in a sensitive manner using appropriate methods and materials. The demolition of the window at ground floor to allow the introduction of the door, will result in the loss of one timber-framed window, which is likely to be a post-war insertion. The new entrance will balance the existing door and utilise a burnished metal frame to match the treatment of the existing metal-framed windows above and will also incorporate the steel beam above the existing window. The proposal will not adversely impact upon the wider fabric of the Locally Listed building or cause harm to its interest as embodied in its architectural form or townscape significance but will preserve and enhance these qualities.
- 4.13 The proposal has been developed with due consideration of S.66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in relation to the setting of listed buildings and seek to be consistent with the heritage policies of the National Planning Policy Framework and Camden Local Plan as well as Historic England's guidance in relation to heritage assets.
- 4.14 The Site is acknowledged as making a positive contribution to townscape quality and visual amenity. The modest proposals for the building seek to support and sustain this contribution through a carefully considered programme of improvement, via a high quality, contextual design which will have a cohesive relationship with the existing building as well as a respectful relationship with the older buildings within the townscape.
- 4.15 The heritage assets on Stanhope Street, located adjacent to the Site are be deemed to be sensitive to any proposal for the Site. Due to distance and intervening built form, it is not considered that any heritage assets north or west of the Site - as identified in section 2 above - are sensitive to the proposal.



- 4.16 The proposal will, inevitably, be seen in the setting of the heritage assets on Stanhope Street having intervisibility with the site. The question is not that it can be seen, but the quality of what is actually seen, including the degree to which its design is respectful or deferential to its neighbours, and so on.
- 4.17 The proposal is modest and will introduce an undoubted public benefit via a new, accessible level access to the building, helping to improve the continuing economic vitality of the building as well as its appearance and its contribution to the streetscape and setting of nearby heritage assets.

#### Summary

- 4.18 The principal objective of the proposal is to introduce a new level access entrance on Stanhope Street by (re)opening the southernmost ground floor window. A secondary aim is to improve the housing for the building's large refuse bins in order to clean up the street frontage.
- 4.19 The conclusion of this assessment is that the effect of the proposal upon the setting of the adjacent designated heritage assets will be positive and enhancing. Their heritage significance is safeguarded, sustained and enhanced.
- 4.20 The effect upon the setting of built heritage assets further from the site will be neutral, given the lack of intervisibility with the site and therefore their heritage significance will also be safeguarded and sustained (by having no effect).
- 4.21 The proposed scheme will have a positive effect upon townscape quality, adding visual interest and reinforcing the Locally Listed building's contribution by virtue of a careful and contextually appropriate design.

## 5 Compliance with policy and guidance

### Introduction

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

### The Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed works preserve and enhance the setting of nearby listed buildings. The proposed scheme thus complies with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

### The National Planning Policy Framework

#### *Specific requirements of the NPPF in respect of heritage assets*

- 5.3 This report has referred to and used a detailed description and analysis of the significance of the site and its heritage context, as required by Paragraph 207 of the National Planning Policy Framework.

- 5.4 The proposal satisfies paragraph 210 in making a sustainable and positive contribution to the community and economic vitality of this part of Camden as well as a positive contribution to local character and distinctiveness.

#### *The level and nature of 'harm' caused*

- 5.5 Having concluded that the proposed scheme will preserve and enhance the relevant designated heritage assets, we now consider whether harm – in the sense used by the National Planning Policy Framework – is caused to heritage assets.
- 5.6 As outlined in Section 4, the NPPF identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm (or total loss of significance)' or 'less than substantial' harm. Both levels of harm must be caused to a designated heritage asset – in this instance the nearby listed buildings. Harm to non-designated heritage assets is not allocated a level.
- 5.7 The only potential for 'substantial harm' (NPPF para. 214 of the NPPF) would be if the proposal caused the loss of something central to the special interest of nearby designated heritage

assets. The proposal evidently does not give rise to this level of harm.

5.8 Similarly, we also do not believe that any 'less than substantial harm' (NPPF para. 215) to the setting of listed buildings is caused by the scheme.

5.9 In summary, the proposed scheme very definitely strikes the balance suggested by the NPPF – it intervenes in the setting of nearby listed buildings in a manner commensurate to their special interest and heritage significance and certainly preserves and enhances that interest.

Historic England guidance on the setting of heritage assets

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

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

This is done in Section 2 of this report.

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

This is discussed in Section 2.

- Step 3: assess the effects of the Proposed Development, whether beneficial or harmful, on that significance:

This is undertaken in Sections 4 and 5 of this report.

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

This formed part of the design process which is described within the accompanying DAS.

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

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

#### The London Plan

- 5.11 The proposed scheme would be consistent with the London Plan and fully complies with its Heritage (Chapter 7) policies.
- 5.12 The proposed scheme will be consistent with Policy HC1 Heritage Conservation and Growth in that the applicants have sought to identify, understand and conserve the historic environment and the proposal clearly conserve the significance of nearby heritage assets, and their settings, by being 'sympathetic to their significance and appreciation within their surroundings'.

#### Camden's Local Plan

- 5.13 This report has shown how the significance of surrounding heritage assets, including any contribution made to their setting, has been taken into consideration in the design of the proposed works.
- 5.14 The proposal is of a high quality and are respectful of local context and character and thus fully respect and comply with the LB Camden's policies in relation to Heritage.

#### Summary

- 5.15 The proposal will preserve the special architectural or historic interest of nearby Listed buildings by preserving and enhancing their setting and it therefore complies with S.66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 5.16 The proposed scheme is found to be consistent with the heritage policies of the National Planning Policy Framework, the London Plan and the Camden Local Plan.

## 6 Summary and conclusions

- 6.1 The site, 184-192 Drummond Street, is a Locally Listed, 5-storey (plus basement) brick faced building located at the corner where Drummond Street and Stanhope Street meet. The building was constructed in the early part of the 20th century as a furniture warehouse but suffered war time damage and so only a small part of its original fabric survives. It was later converted into office accommodation and underwent a major refurbishment in 2000s.
- 6.2 Planning permission is sought for:  
“Installation of new bin store enclosure, creation of new entrance with level access and replacement of existing glazing on west elevation at ground floor level of 184-192 Drummond Street.”
- 6.3 The purpose of this report is to assess the proposal for the site against national and local policies and guidance relating to the historic built environment.
- 6.4 The proposed scheme would affect the setting of heritage assets however we conclude that these impacts will be positive and will safeguard, sustain and enhance heritage significance.
- 6.5 There will be a clear enhancement in the quality of the local townscape via the introduction of a high-quality piece of architectural design that carefully responds to its context in its design and use of materials.
- 6.6 The proposal will preserve the special architectural or historic interest of nearby Listed buildings by preserving and enhancing their setting and it therefore complies with S.66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 6.7 In conclusion, the proposed scheme is found to be consistent with legislation and the heritage policies of the National Planning Policy Framework, the London Plan and the Camden Local Plan.

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