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Design and Access Statement Heritage Statement

2 Waterhouse Square

CMGRP Ltd

June 2012

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Report Status:
Final

Issue Date:
June 2012

CgMs Ref:
LH/13983

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2 WATERHOUSE SQUARE

1.0 INTRODUCTION

This Heritage Statement has been prepared by CgMs Consulting on behalf CMGRP UK Ltd, in relation to internal works proposed for the first and second floors of 2 Waterhouse Square, which largely consist of the insertion of lightweight dividing walls.

2 Waterhouse Square forms part of the Grade II* listed 'Prudential Assurance Building, 142 Holborn Bars', as identified within the list description. The site is also within the Hatton Garden Conservation Area, but given that the proposed works are entirely internal, it is not considered that the scheme will have any impact on the character and appearance of the building, and no assessment is therefore provided within this document.

2 Waterhouse Square, in contrast to other parts of the former Prudential Assurance Building, consists largely of a substantial, late 1980s to early 1990s office building. This was attached to the rear of the former Prudential building which was developed over the period between 1885 and 1932 and the building at 2 Waterhouse Square itself has recently been the subject of a substantial degree of internal alteration and refurbishment. While statutorily designated as a single listed building, it is evident that the former Prudential Assurance Building consists of buildings which have experienced various stages of development over a long period of time. Some sections of the building therefore contribute more to its significance than others, nonetheless the listing, in statutory terms, applies equally to the entire building. This document will therefore provide an assessment of the works both within the historic and more recent sections of the building.

This document will therefore present a summary of the relevant legislative framework and planning policy at both national and local levels with special regard to that which relates to listed buildings, and a history of the building and its development within the area in order to assist those involved in the determination of this application. An informed assessment of the proposals' impact on the heritage asset of the former Prudential Assurance Building will be undertaken, based on an understanding of the special interest of the listed building. The proposals have been informed by pre-application discussions with officers from the London Borough of Camden's Conservation following a pre-application site visit that was held on 22 May 2012. This report should be read in conjunction with other documents submitted with the application.



Figure 1. The original building by Alfred Waterhouse as seen from High Holborn.

2.0 LEGISLATIVE FRAMEWORK

2.1 NATIONAL AND STRATEGIC POLICY AND GUIDANCE

Where any development may affect designated or undesignated heritage assets, there is a legislative framework to ensure the proposals are developed and considered with due regard for their impact on the historic environment.

Legislation

Legislation regarding buildings and areas of special architectural or historic interest is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act). 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. A similar duty exists in respect of Conservation Areas under section 72 of the Act.

National Planning Policy

National Planning Policy Framework (2012)

The National Planning Policy Framework (NPPF) was published on 27 March 2012 and is the document which sets out the Government's planning policies for England and how these are expected to be applied. It has been with the intention of providing a framework within which Local Planning Authorities (LPAs) and local people 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 presumption in favour of sustainable development; the 'golden thread' which is expected to run through their plan-making and decision-making. It must be noted however that this is expected to apply except where this conflicts with other policies contained within the NPPF, including those relating to the protection of designated heritage assets. (Paragraph 14)

Section 7, 'Requiring Good Design' reinforces 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, in paragraph 58, 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.

Section 12, 'Conserving and Enhancing the Historic Environment', relates to developments that have an affect upon the historic environment. These policies provide the framework 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.

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:

- 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 128, states that when determining applications, LPAs should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting. 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. This is supported by paragraph 129, which requires LPAs to identify and assess the significance of any heritage assets which may be affected by proposals, and to take this assessment into account when considering applications.

Paragraphs 132 to 136 consider the impact of a proposed development upon the significance of a heritage asset. Paragraph 132 emphasises the importance of conserving heritage assets and that harm or loss to a heritage asset requires clear and convincing justification. Paragraph 134 states that where less than substantial harm is proposed to a designated heritage asset, the harm should be weighed against the public benefits of the proposal, which include securing the asset's viable optimum use.

National Guidance

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.

In line with *PPS 5*, the document emphasises the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The English Heritage 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.' (para. 25)

Strategic Policy

The London Plan, adopted July 2011

On 22 July 2011 the Mayor of London published a new version of the London Plan which replaced the amended version of 2004. This is the new strategic Development Plan for London, and Policy 7.8, 'Heritage Assets and Archaeology' seeks to record, maintain and protect the city's heritage assets in order to utilise their potential within the community. It states that development should identify, value, conserve and re-use heritage assets, where appropriate, and be sympathetic to their form, scale, materials and architectural detail

The London Plan therefore encourages the enhancement of the historic environment and looks favourably upon developments which seek to maintain the significance of heritage assets, including their setting.

2.2 LOCAL POLICY AND GUIDANCE

Camden Core Strategy 2010-2025 (2010)

The Core Strategy, adopted in November 2010, is the principal document in the Local Development Framework and provides the vision, objectives and spatial policies to guide development in the Borough up to 2025.

Strategic Policy CS14 (Promoting High Quality Places and Conserving our Heritage) states that the Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by requiring development of the highest standard of design that respects local context and character; preserving and enhancing the Borough’s heritage assets, including listed buildings; and seeking the highest standard of access in all buildings.

Camden Development Policies (2010)

The Camden Development Policies document, adopted in November 2010, forms part of the Local Development Framework alongside the Core Strategy, and provides more specific planning policies, to be used by the Council when determining individual planning applications.

Development Management Policy DP24 (Securing High Quality Design) states that the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider, among other issues, the character of the existing building; the quality of materials to be used, and accessibility.

Policy DP25 (Conserving Camden’s Heritage) states that, in relation to listed buildings, the Council will: prevent the total and substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for the retention; only grant consent for a change of use, alterations or extensions to a listed building where it considers this would not cause harm to the special interest of the building.

Local Guidance

London Borough of Camden have prepared Camden Planning Guidance (CPG) to support the policies in the Local Development Framework (LDF). The guidance is consistent with the Core Strategy and the Development Policies, and forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions.

Camden Planning Guidance 1: Design (2011)

Adopted in April 2011, this guidance provides information on all types of detailed design issues within the Borough and includes the following sections:

1. Design excellence
2. Heritage
3. Extensions, alterations and conservatories
4. Roofs, terraces and balconies
5. Landscape design and trees
6. Shopfronts
7. Advertisements, signs and hoardings
8. Designing safer environments
9. Waste recyclables storage
10. Building services equipment