



ENGLISH HERITAGE
LONDON OFFICE

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Our ref: L00436102

21 October 2014

Dear Mr Nelson

**Notifications under Circular 01/2001, Circular 08/2009 &
T&CP (Development Management Procedure) Order 2010
23 GOODGE PLACE LONDON W1T 4SN
Application No 2014/5843/L**

Thank you for your letter of 2 October 2014 notifying English Heritage of the application for listed building consent relating to the above site.

Summary

Goodge Place was developed in the mid C18 as part of the wider development of Fitzrovia. Its terraced housing, which dates from this period, is statutory listed grade II and is identified within the Charlotte Street Conservation Area Appraisal as "one of the most consistent Georgian Streets in the area". 23 Goodge Place, whilst suffering some harm from previously unsympathetic alterations, is of aesthetic and historic value and is a designated heritage asset. The proposed extension at roof level would remove the original roof form, which contributes to its special interest, and replace it with a roof extension, the scale, form, design and materials of which do not reflect the established character and appearance of the conservation area or the 'polite' Georgian architecture which dominates the street. We do not consider that a clear and convincing case that justifies the harm to the heritage assets has been made which addresses national and local planning policy. English Heritage, therefore, does not support this application.

English Heritage Advice

Historic context

The terraced house underpinned the development of London from the C17 onwards and as a building type, makes an outstanding contribution to the historic and aesthetic significance of London.

Fitzrovia, developed in the mid C18 as one of the great private estates of the 'West



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End', followed the pattern of Georgian terraced townhouses found across the city. Constructed in brick and often with stucco finishes, vertically proportioned on narrow plots with a well defined parapet roof and sliding sash windows which reduce in proportion above the *piano nobile* (first floor principal rooms), the terraces within the Charlotte Street Conservation Area follow a uniform pattern of height, scale, form and detail which contribute positively to its character and appearance.

The conservation area appraisal identifies Goodge Place as "one of the most consistent Georgian Streets in the area" with many of the four storey Georgian townhouses which line the east and west sides of the street retaining their original detailing. The buildings within the terraces are listed grade II and are of aesthetic and historic significance both in their own right and as part of the wider group of which they form a part. 23 Goodge Place has suffered some unsympathetic alterations including the painting of the external brickwork and neglect with the growth of budliea from its parapet. Despite this harm, the building retains some historic fabric and remains of aesthetic and historic value in itself and as part of the protected streetscene.

Proposals

The application seeks to remove the existing butterfly roof behind the parapet to erect a single storey roof extension for residential use as a penthouse flat.

Policy

The policies outlined below form the statutory basis on which your authority is duty bound to make its decision unless there are material reasons why this should not be the case.

Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas. With regard to listed buildings, it states that the determining authority, '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.' And in respect of conservation areas, it requires that 'special attention be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

NPPF policy advises that for new development to be sustainable it needs to



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encompass an economic, social and environmental role, with the latter including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Paragraph 7 of the NPPF states that the environmental role of a development includes protection and enhancement of the historic environment, while section 12 sets out how the historic environment should be conserved and enhanced. Paragraph 132 states that when considering the impact of a proposed development on a heritage asset, 'great weight' should be given to preserving its significance and that 'any harm or loss should require clear and convincing justification'.

The Revised London Plan, as adopted in July 2011, provides a strategic framework for development in London. This includes key policies related to the safeguarding of London's heritage assets and their settings. Specific policies related to this proposal which should be addressed include policy 7.8 (heritage assets) part D (planning decisions) of the London Plan states that "development affecting heritage assets should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail". Similarly, policy 7.9 Heritage-led Regeneration, part B requires the significance of heritage assets to be assessed when development is proposed.

English Heritage's 'The Setting of Heritage Assets' guidance sets out how we assess the implications of development proposals affecting setting, providing a clear framework for consistent decision-making. It is also intended to assist others involved in managing development that may affect the setting of heritage assets.

DP24 of Camden's Local Development Framework policies seeks to secure high quality design by considering, "(a) the character, setting, context and the form and scale of neighbouring buildings" and "(b) the character and proportions of the existing building, where alterations and extensions are proposed." DP25 seeks to conserve Camden's heritage by (b) only permitting development within conservation areas that preserve and enhance the character and appearance of the conservation area and (f) only grant consent for extensions to a listed building where it considers this would not cause harm to the special interest of the building.

Position

23 Goodge Place is of aesthetic and historic significance as part of a group of listed buildings within the Charlotte Street Conservation Area. Whilst it is unclear from the application whether the roof contains historic fabric, its form is clearly that of the original roof and is the same as the wider group which also remain unaltered. The scale, bulk, form, materials and design of the proposed extension do not reflect those



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of the historic building. Given the significance of the historic environment in this area and the established Georgian appearance of Goodge Place, an extension which is more industrial in its appearance would appear incongruous and cause harm to the heritage assets.

It is unclear from the application how one would gain access to the upper floor penthouse and what impact, if any, this would have on the listed building on other floors such as its plan form and staircase. Any associated alterations should form part of the application.

The application does not address the relevant planning policies, either national or local, which seek to protect heritage assets. In the absence of 'clear and convincing justification' as required by the NPPF, English Heritage is unable to support this application as in our view, the proposals would harm the aesthetic and historic significance of the grade II listed building, the group of which is forms a part and the conservation area.

Recommendation

In our view, the application does not meet the tests within the NPPF or address national or local policy requirements. The loss of the historic roof form would harm the listed building and harm the wider group of which is forms a part, which remains largely unaltered at roof level. Given the harm to the heritage assets identified above and in the absence of clear and convincing justification for these proposals, English Heritage is unable to support this application.

We would welcome the opportunity of advising further as the implications of this application are significant and we are unable to direct as to the granting of listed building consent at this stage. Please consult us again if any additional information or amendments are submitted.

Please note that this response related to historic building matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3735).



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Yours sincerely



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