Donald Insall Associates
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Melia White House Hotel, Albany Street

Historic Building Report
For Melia White House

January 2017

Melia White House Hotel, Albany Street

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Ordnance Survey map with the site marked in red.
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Summary of Historic Building Report

1.1 Introduction

Donald Insall Associates was commissioned by Melia White House in December 2016 to assist them in the preparation of proposals for Melia White House Hotel, Albany St, London NW1 3UP.

The investigation has comprised historical research, using both archival and secondary material, and a site inspection. An illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3. The investigation has established the significance of the building, which is set out below. This understanding has informed the development of proposals to replace the windows, as outlined in the documents by Lane & Frankham which this report accompanies. Section 4 provides a justification of the scheme according to the relevant planning policy and guidance.

1.2 The Building and its Legal Status

The White House, now known as the Melia White House Hotel, is a Grade II-listed building and it is located adjacent to the Regent's Park Conservation Area in the London Borough of Camden. Development which affects the special interest of a listed building or its setting requires listed building consent and planning permission.

The statutory list description is included in Appendix I, while extracts from the relevant planning policy documents is in Appendix II.

In considering applications for listed building consent and planning permission, local authorities are also required to consider the policies on the historic environment set out in the National Planning Policy Framework. The key message of the NPPF is the concept of 'sustainable development' which for the historic environment means that heritage assets 'should be conserved in a manner appropriate to their significance'. The NPPF recognises that, in some cases, significance can be 'harmed or lost through alteration or destruction of the heritage asset or development within its setting'. The NPPF therefore states that any harm or loss 'should require clear and convincing justification' and that the 'public benefits of a proposal' should outweigh any 'less than substantial' harm caused to the significance of a designated heritage asset. A designated heritage asset is defined as a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area. Undesignated heritage assets are defined as a building, monument, site, place, area or landscape 'identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest … [including] assets identified by the local planning authority (including local listing)'. Where undesignated heritage assets are concerned, the NPPF states that 'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

1.3 Assessment of Significance

The White House was designed in 1935 as serviced flats by Robert Atkinson (1883-1952). Lindsay Parkinson in 'This Way Forward' (1955) describes 'the plan [as] daring, both in materials and layout.' The building's primary significance lies with Atkinson's very modern approach to the building and its resulting overall form and unusual plan. The unique star-shaped plan provides natural ventilation and light without the need for lightwells, which were a common feature by this

date. The building was also constructed using up-to-date materials, including a reinforced concrete structure and faience cladding. Atkinson was also innovative in his approach to servicing the building, particularly with the use of risers and the embedding of lighting and heating services within the concrete floors.

The modern single-storey extensions between the west and east wings are detracting features as they undermine the original plan form, which is of the highest significance. The modern uPVC windows are poor-quality replacements that are also detract from the significance and appearance of the building as they undermine the uniformity of façades.

1.4 Summary of Proposals and Justification

It is proposed to replace all of the casement windows with new steel casement windows which incorporate double glazing. The windows are largely modern replacements but some original units remain to the west and north. The proposals would reinstate the original uniform appearance of the building and would enhance its significance. The introduction of double-glazing is also very much in keeping with the original forward-thinking spirit of the building. Another benefit of the scheme is the reduction in heat loss which would reduce heating costs and Co2 emissions.

The impact of these works on the significance and special interest of the listed building is neutral positive one, for the reasons set out in Section 4 below. Therefore, the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 are fulfilled by the proposals. No harm would be caused, and therefore the presumption in favour of sustainable development in the National Planning Policy Framework should be adhered to. If, however, there is any perceived harm to the listed building, the public benefits would be of a sufficient degree to outweigh what would certainly be ‘less than substantial harm’.

In conclusion, the proposals should be granted planning permission and listed building consent.

2.1 The Area

John Rocque's 1746 map of London shows that the land north of Tottenham Court and what was then known as Mary Le Bone (now Marylebone) was predominantly arable land [plate 1]. It was not until the early 19th century that development of London reached beyond the Marylebone Road. In 1811, The Prince Regent (later King George IV) commissioned the architect John Nash to design The Regent's Park, with rows of grand terraced housing surrounding the landscaped park [plate 2].

Nash's audacious scheme envisioned a via triumphalis rooted at Carlton House in the south – then the home of the Prince Regent – stretching across Oxford Street and sweeping up Portland Place to a picturesque arrangement of villas and terraces set within the former hunting grounds. A summer palace for the Prince Regent was also planned in the park, but never built. Nash's scheme for the park, after several permutations including a steep decrease in the number of villas from fifty-six to eight, was accepted in 1812 and took seventeen years to build.

As Portland Place problematically stopped just short of Marylebone Park and the New Road (Now Marylebone Road) – laid in 1756-7 at the outer edges of the metropolis to relieve east-west traffic in the centre of London – Nash was faced with the difficulty of how to extend the grandeur of the late-18th-century Portland Place and carry the eye and mind over the humdrum trade of the New Road (now Marylebone Road) and on into the park Nash resolved to build a full circus over the junction [plate 2]. However, after the completion of the southern section of the circus in 1823, it was remodelled into a crescent and a square with symmetrical terraces [plate 3].

Plate 1. *John Roque's 1746 map*

Plate 2. *Regent's Park plan 1812 (Westminster Archive T136 (440).*

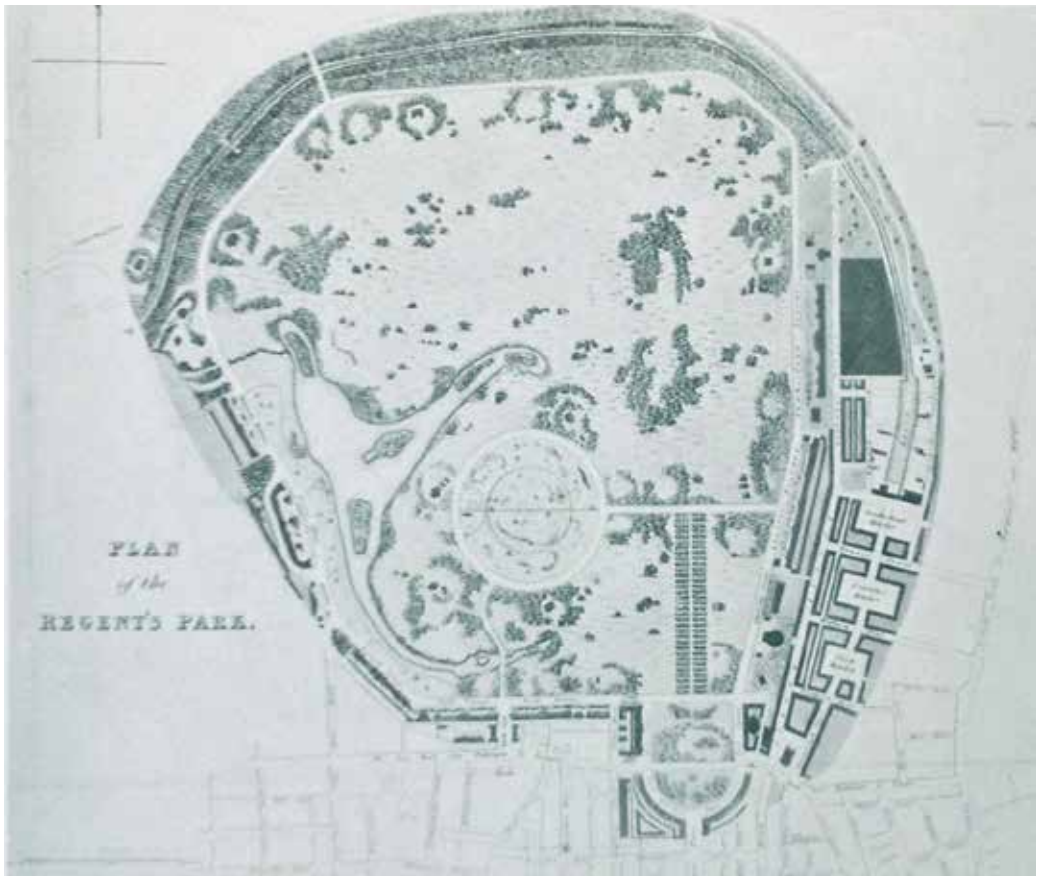

Plate 3. *Regent's Park plan 1826 (Westminster Archive T136 (64))*

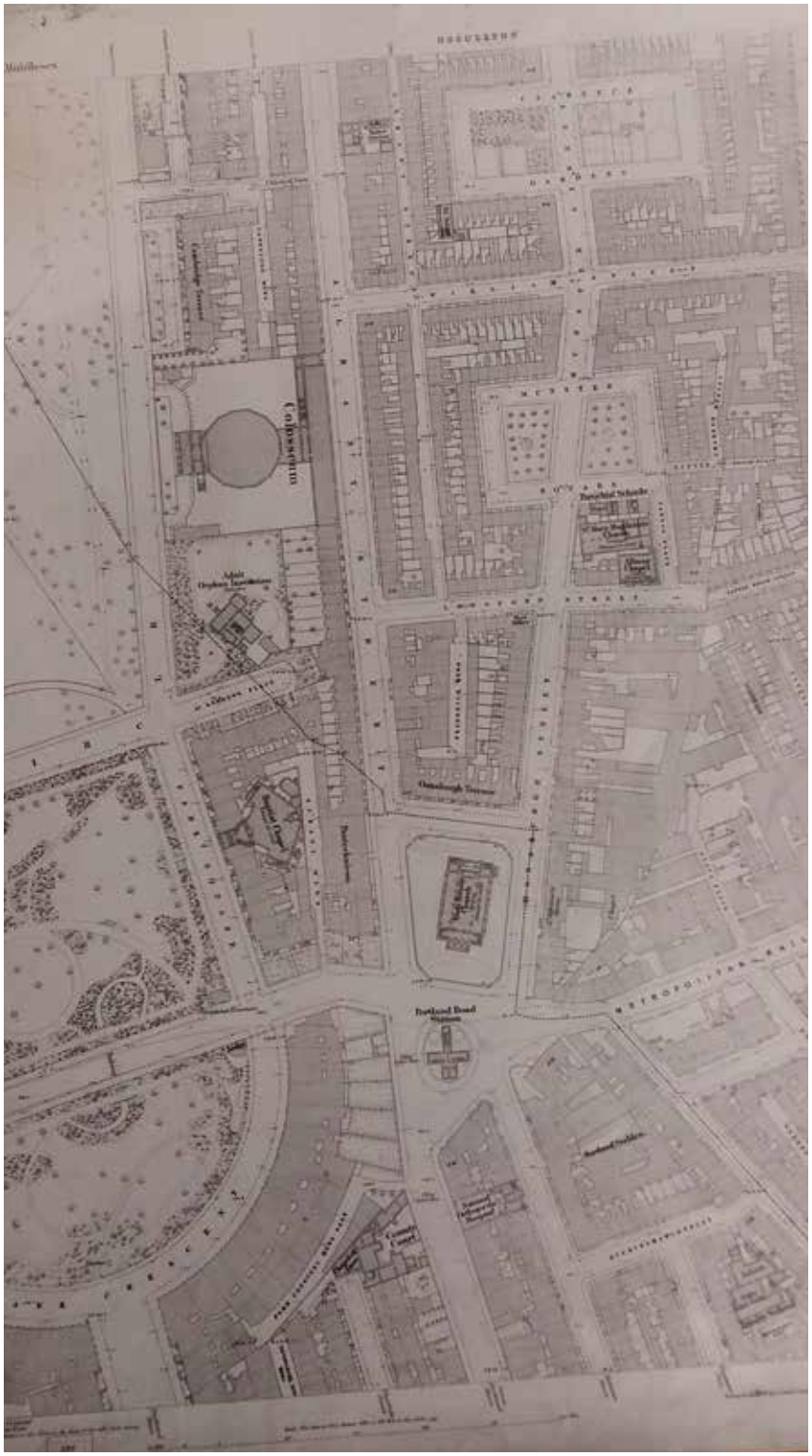

Plate 4. *1870 Ordnance Survey Map*

Plate 5. *Original Plot of the White House, 1870 Ordnance Survey Map*

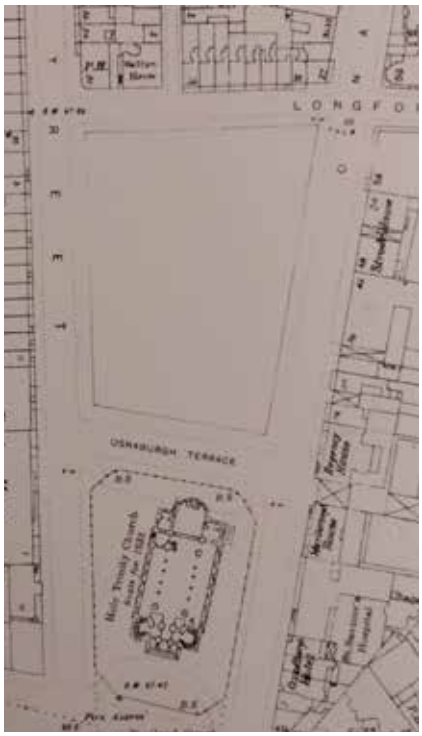

Plate 6. *Demolished Buildings, 1935 Ordnance Survey Map*

2.2 The White House

The 1870 Ordnance Survey map shows Nash's completed crescent to the north of Portland Place [plate 4]. Holy Trinity Church, designed in 1825 by Sir John Soane, is shown to the north-east of the crescent. Further north is a plot of land (now occupied by the White House, the subject of this report) that was bounded by Osnaburgh Terrace (south), Albany Street (west), Longford Street (north), and Osnaburgh Street (east) [plate 5]. This plot of land was flanked on each side by rows of terraces. At the centre of the plot was a small road, Fredrick Mews, accessed from Longford Street, which contained a number of small mews buildings.

Rebuilding in the area began in the 1930s, which included the redevelopment of this plot of land. The existing terraces and mews buildings were demolished by 1935 [plate 6] and were replaced by a new block of c.780 luxury serviced flats. The new building was designed by the architect Robert Atkinson (1883-1952) and was complete by 1936. The consulting engineers were The Trussed Concrete Steel Engineering Co. Ltd. An original drawing of the front elevation shows the 9-storey building with casement windows with long horizontal glazing bars flanked by narrower horizontal glazing bars [plate 7]. The central roof-level tower shown in this drawing does not appear to have been constructed.

In Pevsner's 'Buildings of England' the building is described as 'quite modern for its date', while Lindsay Parkinson in 'This Way Forward' (1955) states that 'the plan is daring, both in materials and layout.' The building has a star-shaped plan, with a central service area from which various wings radiate. This form of plan was radical at the time as it provided optimum light and ventilation without the need for lightwells, a feature of many buildings by this date. This unique star-shaped plan is clearly shown in a 1955 photograph of the building [plate 8].

The main structure of the building is a reinforced concrete framework, with reinforced concrete retaining walls below street level serving a basement and sub-basement. Externally the building is faced with faience slabs which are secured to a brickwork skin with copper cramps. The original windows used in the building were single-glazed steel framed Crittall windows.

The services were carefully considered before construction. All services to the flats were carried through concealed ducts which could be easily accessed for repairs. Although this is common practice today, Parkinson notes in 'This Way Forward' that is was 'a novelty in 1935.' The electric and heating systems were also built into the concrete floors.

The flats were served by many public areas, such as a lounge, restaurant, and a dance floor, in addition to a swimming pool and squash courts. Other facilities included a delicatessen, newsagents, chemist, hairdresser and dry cleaners. The basement was occupied by kitchens and storerooms, while there was a garden at roof level.

From 1959 the building was gradually converted into a hotel and by 1970 the building operated officially in hotel use. In 1972 the hotel was purchased by Rank Organisation who undertook a three-year renovation. During the 1980s a new lift system was installed and many of the public and private areas were refurbished, including the main lobby, the bar and the bedrooms. By 1990 a business centre, leisure centre and new conference and banqueting suites had been formed.

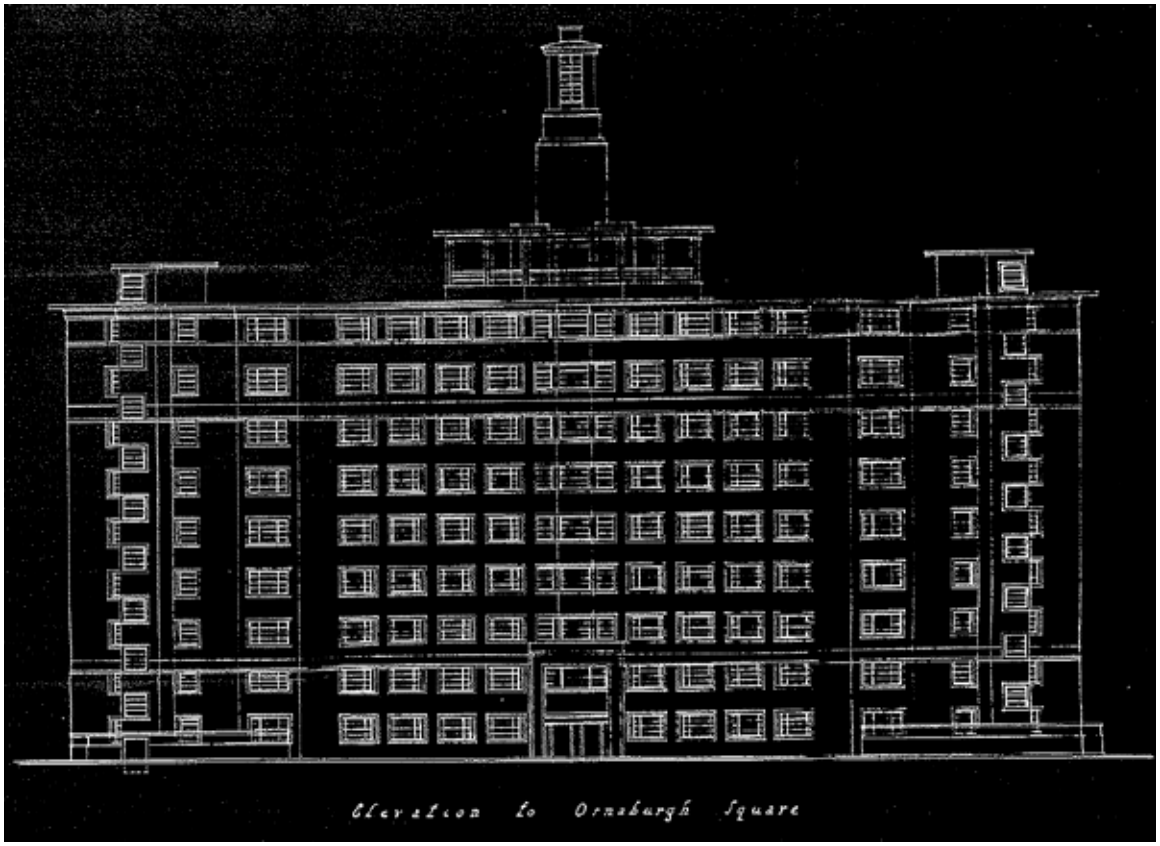

Plate 7. *Front Elevation, 1935 (Camden Archives)*

Plate 8. *The White House, 1955 (This Way Forward)*

Ordnance Survey maps show that between 1974 and 1995 the building was altered with the addition of several extensions located between the west and east wings, which on-site inspections have revealed are single storey [plates 9 & 10]. In 1999 the building was statutorily listed and the list description states that many of the original steel windows were replaced in c. 1992 with uPVC windows of a similar design. Although the overall design of the windows was copied, the modern replacement windows lack detail. The difference between the original and replacement windows is therefore very apparent, as shown in a current photograph of the north-west wing [plate 11].

Sol Meliá purchased the building in 1999 and completed a major renovation project, including works to the entrance lobby, bedrooms, meeting rooms and restaurant. The total number of available hotel bedrooms is 548.

Plate 9. *1974 Ordnance Survey Map*

Plate 10. *1995 Ordnance Survey Map*

Plate 11. *Original and Modern Windows (DIA, 2017)*

2.3 Relevant Planning History

- 8700503 – Granted April 1987

Installation of an automatic circular door to the main entrance and modernization of the facade to Albany Street entrance to banquetting suites as shown in drawing numbers 937/201B and 937/103.

- LSX0104071 – Granted July 2001

Retrospective application for the installation of secondary glazing to first and second floors of “A” wing (north-east block).

- PSX0105001 – Granted October 2001

Retrospective permission for temporary canopy on Longford Street entrance; and one new air plant enclosure on flat roof over ground floor on D-E wing.

- LSX0105119 & PSX0105118 – Granted November 2011

Installation of new screen and revolving doors to main entrance of hotel.

- LSX0204286 – Granted April 2002

The installation of secondary glazing to windows on the 3rd, 4th, 5th, 6th, 7th and 8th floors of ‘A’ wing.

- 2011/4612/P & 2011/4621/L – Granted January 2012

Alterations including the replacement of the existing external doors and access and the addition of a new canopy structure on Osnaburgh Street elevation to existing hotel (Use Class C1).

- 2015/1260/L – Granted July 2015

Cleaning the faience elevations to the hotel, carrying out localised repairs.

2.4 The Architect: Robert Atkinson (1883-1952)

The following is an abridged version of Robert Atkinson’s entry in the Oxford Dictionary of National Biography - http://www.oxforddnb.com/view/article/38347?docPos=3

Atkinson, Robert (1883–1952) was born on the 1st August 1883 in Cumberland, the son of Robert Atkinson, a joiner and cabinetmaker, and his wife, Elizabeth Johnston. By 1896 his family had moved to Nottingham and there he trained as an architect at the Nottingham School of Art and at University College. He was articled to the Nottingham architect James Harris before moving to London in 1905, working in the office of John Belcher. He later became a draughtsman for C. E. Mallows, the country-house architect, and collaborated with R. Frank Atkinson (no relation) and the leading landscape architect T. H. Mawson.

In 1907 he set up in practice with George Nott, Charles Gascoyne, and Alick Horsnell and in 1912 entered into partnership with George Alexander. The following year he was appointed head of the Architectural Association School, London, and in 1915 he was elected FRIBA.

In his buildings Atkinson showed himself a highly versatile eclectic and he made his name as a pioneer in cinema architecture. His talents for colour, decoration, and interior design, developed in cinemas in Edinburgh, Liverpool, and numerous midland towns, culminated with

the Regent Cinema, Brighton (1919–21; 1923; dem. 1974), called by Howard Robertson 'his No. 1 Symphony'. This was the first luxury cinema designed on the American model in Britain and was one of the most remarkable British buildings of the 1920s. Atkinson's flair for decoration reached its peak in the entrance hall of the Daily Express Building (1931–2), probably the best surviving art deco interior in Britain.

Atkinson also engaged in new building techniques and types. St Catherine's Church, Hammersmith (1922–3; dest. 1940), was the first steel-framed church in England and the Barber Institute of Fine Arts at the University of Birmingham (1935–9) was the first British purpose-built institution for the study of art history. The Barber Institute was deemed by Sir John Summerson to represent 'better than almost any other building (except, perhaps the RIBA in Portland Place) the spirit of English architecture in the 1930s'. Other inter-war works by Atkinson included: the Gresham Hotel, Dublin (1925–7); the Dome Hall of Music and Corn Exchange, Brighton (1934–5); Wallington Town Hall and Municipal Library (1933–5); and Oslo Court, Regent's Park (1936–7). After the war Atkinson worked on electric power stations at Croydon (1945–51) and Wigan (1947–51). In the post-war years, with economic stringency and the predominance of the modern movement, he found himself obliged to produce less creative and convincing work, such as the government offices, Marsham Street, Westminster (begun in 1949 but radically revised after his death), and the government rehousing scheme, Gibraltar (1946–50).

In 1927 Atkinson was awarded an honorary MArch by the University of Liverpool, and the same year was appointed an assessor of the competition for the Shakespeare Memorial Theatre, Stratford upon Avon. In 1931 he became an assessor for the RIBA Building, Portland Place, London, and for the city hall, Norwich. In 1932 he was made a director of the Building Centre. Five years later he and his partner, Alexander Anderson, were awarded the RIBA London architecture bronze medal for Stockleigh Hall flats, Regent's Park, and in 1946 he gained the RIBA architecture bronze medal for the Barber Institute. In 1951 he was appointed OBE. His death occurred unexpectedly, after a short illness, on the 26th December 1952 at Beaumont House, Beaumont Street, London.

2.5 Sources and Bibliography

Camden Local Archives
Drainage Plans

Published Sources

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Colvin, H., 'A Biographical Dictionary of British Architects 1600-1840', London: 1995Mansbridge, M., 'John Nash A Complete Catalogue' Oxford: 1991
Parkinson, L., 'This Way Forward: A resume of building construction and civil engineering during seventy-five eventful years', 1955
Summerson, J., 'John Nash Architect to George IV George', Allen & Unwin: 1935

Websites

http://www.oxforddnb.com/view/article/38347?docPos=3
http://www.regentpalacehotel.co.uk/the_melia_white_house_hotel.asp

3.1 The Setting of the Building

The immediate setting of the listed building is quite varied. It occupies an island site and is bounded on all four sides by wide roads. To the south of the site is Holy Trinity Church, design in 1825 by Sir John Soane. The principal elevation of this Portland-stone building is at its southern end, while the elevation facing the White House is of yellow stock brick, with an apsidal end. To the west of the site is a terraced row of four-storey stuccoed houses. A three-storey pub is located to the north-west of the site, which has a corner turret, and adjacent to this is a four-storey block of flats. Both buildings date from c. 1900 and are of red brick with faience detailing. Further east, to the north of the site, is a long modern four-storey block of flats of yellow brick with red-brick detailing. The façade has been broken with the addition of plain protruding bays supported on round columns. Large modern office block developments are located to the east of the site, ranging from 9 to 18 storeys.

3.2 The Building Externally

This 9-storey white faience-clad building has an unusual star-shaped plan which has largely been retained, apart from the addition of several single-storey extensions between the west and east wings. The casement windows generally consist of long central horizontal glazing bars flanked by narrower horizontal glazing bars; originally these were steel-framed windows but many have been replaced with uPVC versions. The elevations are decorated with thick faience cills bands but otherwise the façades are plain.

The south-western and south-eastern wings mirror those to the north [plate 12]. These wings are five bays in length and three bays wide, with canted corners. Additional triangular bays which rise above roof level are located at the ends of each wing. To the south the windows are all modern uPVC replacements, while the north the windows are somewhat varied with a mixture of what appear to be the originals and modern uPVC replacements. The north-west wing retains four floors of original metal windows, while the north-east wing retains mostly original metal windows, apart from a handful of modern replacements on the south elevation.

The central eastern and western wings also mirror each other and are seven bays in length, with the upper floors set back forming stepped roof lines [plate 13]. The end elevations are five bays wide and the upper floors also narrow at the top in a stepped manner [plate 14]. The windows to these wings vary considerably. The western wing includes mostly original windows to the south, apart from a number at the top which appear to be modern, all original windows to the west, and mostly original windows to the north, apart from the top three floors. The eastern wing has lost much of its original fenestration and includes all modern windows to the south and west, and roughly half modern and half original to the north. The replacements are mainly uPVC and clearly identifiable as such from street level.

There are also narrower windows between the wings which light the central service core. Like the wings, these vary considerably. The bay between the two southern wings has all modern windows, but otherwise there is a mix of modern and original.

Plate 12. *Southern Wings (DIA, 2017)*
Plate 13. *Western Wing (DIA, 2017)*
Plate 14. *End Elevation, Eastern Wing (DIA, 2017)*

The main entrance is located between to the two southern wings, with a corresponding entrance at the northern side. There are also secondary entrances at the ends of the central eastern and western wings which have doorcases with carved figurative friezes [plate 15]. The original doors have all been replaced.

Plate 15. *Side Entrance Door (DIA, 2017)*

3.3 The Building Internally

The building was not internally inspected.

Commentary on the Proposals

4.1 Description of the Proposals and their Impact on the Listed Building

It is proposed to replace all of the single-glazed windows with new double-glazed metal units, manufactured by Clement.

The existing casement windows generally have long central horizontal glazing bars flanked by narrower horizontal glazing bars. A large proportion of the windows have been replaced with modern uPVC units, which are readily identifiable as such from the ground and to passers-by, particularly to the south of the building where no original windows remain. Those that are original are largely confined to the central western wing and the north-eastern wing, in addition to four floors in the north-western wing and a handful to the central eastern wing. As a result of this ad-hoc replacement, the uniformity of the elevations, and the intended purity of the Art Deco design, has been undermined.

Clement Windows have undertaken an assessment of the condition of the existing windows. The findings of their report demonstrate that the original steel windows have suffered from inadequate maintenance which pre-dates the current owners, and corrosion of the steel is breaking out through the paintwork, both internally and externally. This has resulted in the steel frames becoming distorted and many do not open or shut correctly. As the frames rust and the metal twists this is adding pressure to the glazing system rebates which has also resulted in many of the glass panes becoming cracked and requiring replacement.

This means that the windows are now in such a poor condition that they are not repairable; this is mainly due to metal fatigue caused through advanced corrosion attacking the entire frame, but particularly the opening ventilators. It is therefore proposed to replace both the original and modern windows with new steel replacements. The original steel windows would be replaced like-for-like, while the modern uPVC windows, which lack detail, would be replaced with new metal units that would match the detailing of the original windows, thus reinstating the original character of the building. Clement Windows would supply the new windows and they are acknowledged as a leader in the field of replication of early 20th-century steel windows.

It would clearly be beneficial to reinstate a consistent appearance across the building and this can be best achieved by replacing all of the windows as part of one tranche of works. The significance of the windows is their uniformity and their contribution to the architectural design of the building, not for their individual fabric. These machine-made windows do not carry the same badge of craftsmanship as timber sash windows from the centuries before his building; the windows themselves are entirely typical of the inter-war period. Maintaining uniformity was clearly a key consideration of the original design and it would be of great benefit to reinstate this lost uniform appearance. No less important is ensuring the windows meet modern standards of acoustic performance and thermal insulation; this is also entirely within the spirit of modernity of the place.

The loss of the existing windows would have a neutral impact on the significance of the listed building. This is for two main reasons: first, because the significance of the building lies in its very modern approach to the original design and planning of the building, and these alterations are entirely in the spirit of the place; and secondly, because the windows have, to some extent, already been replaced and the loss of a uniform appearance is harmful to the significance of the building.

4.2 Justification of the Proposals

Where a proposal causes no harm to the significance of a heritage asset, the National Planning Policy Framework (NPPF) directs that there should be a presumption in favour of the development. Any perceived harm caused by the proposals would be very much 'less than substantial' and would be outweighed by the public benefits offered by the scheme. It is perhaps worth reiterating reasons why the proposals are acceptable, and the manifest public benefits they would bring.

The reinstatement of a uniform appearance of the building would reinstate its original character, enhancing the significance of the listed building. The introduction of double-glazing is very much in keeping with the original forward-thinking spirit of the building and forms part of its natural evolution by maintaining modern standards. This would be done without losing any of the detail, particularly in terms of the glazing bars. The current single-glazed windows are also a large source of heat loss. Replacement with double-glazed units would significantly reduce the heat loss from the windows, which would lessen the need for heating and, in turn, reduce C02 emissions. This is a manifest public benefit. The new double-glazed windows would also perform much better acoustically in this busy central London location.

The key benefits of the proposals therefore are:

- Reinstatement of a uniform appearance;
- Application of technology appropriate to the 'spirit of the place';
- Removal of poorly performing and inoperable windows;
- Removal of unattractive and low-quality uPVC windows;
- Improved thermal properties, resulting in reduced need for heating and reduction in C02 emissions;
- Improved acoustic properties.

4.3 Conclusion

It is the conclusion of this Report that there is no reason to withhold listed building consent and planning permission for the proposed window replacement at the White House. This Report has shown what is significant about the listed building, and has also demonstrated that the loss of original fabric would not fundamentally undermine that significance. Rather, it would be entirely within the spirit of this place – which was built as a very modern, forward-thinking development – to undertake a thoughtful and sensitive replacement of the windows in order to improve the thermal performance of the building. The original character and appearance of the building would remain recognisable to its first residents of the 1930s and, more importantly, the new windows would be a clear and unambiguous benefit for its occupants today.

Appendix I

Statutory List Description

Name: THE WHITE HOUSE
List entry Number: 1113231
Grade: II
Date first listed: 11-Jan-1999

Former serviced flats, now a hotel. 1936. By Robert Atkinson. Steel frame clad in pale cream faience tiles, slightly darker to ground floor and bands. Star-shaped plan providing optimum light and ventilation without light-wells. 9 storeys. Diagonal blocks have chamfered angles and central triangular bays which extend above the roof line. 3-light Crittal windows have continuous sill bands and meet at angles of triangular bays. Original steel windows remain in situ to the north-east and central west ranges; all other windows have been replaced with UPVC windows of a similar design in c.1992. Main entrance to Osnaburgh Terrace altered but subsidiary entrance on Albany Street with good moulded doorcase with figurative frieze, approached by steps with original cast-iron handrail. Flat roof with projecting eaves. INTERIOR: not inspected. Spencer-Longhurst P (ed.): Robert Atkinson 1883-1952: Architectural Association: 1989-; 36-37). Bibliography 8011 Robert Atkinson 1883-1952 (Paul Spencer Longhurst), 1989, Page (s) 36,37

Appendix II

Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

> *in considering whether to grant 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 pre—serving the building or its setting or any features of special architectural or historic interest which it possesses.*

Similarly, section 72(I) of the above Act states that:

> *… with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.*

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (2012). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

The NPPF has the following relevant policies for proposals such as this:

> *14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.*

The NPPF sets out twelve core planning principles that should underpin decision making (paragraph 17). Amongst those are that planning should:

- not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);

- 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;

With regard to the significance of a heritage asset, the framework contains the following policies:

> 129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 131 of the NPPF identifies the following criteria in relation to this:

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

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 132 the framework states the following:

> *…great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

> 134. 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 securing its optimum viable use.

National Planning Practice Guidance

The planning practice guidance was published on the 6th March 2014 to support the National Planning Policy Framework and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment. The relevant guidance is as follows:

> **Paragraph 3: What is meant by the conservation and enhancement of the historic environment?**
>
> The conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits.
>
> Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in everyday use to as yet undiscovered, undesignated buried remains of archaeological interest.
>
> In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic

changes may not be necessary.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified, the aim then is to capture and record the evidence of the asset's significance which is to be lost, interpret its contribution to the understanding of our past, and make that publicly available.

Paragraph 7 states:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Paragraph 8: What is "significance"?

"Significance" in terms of heritage policy is defined in the Glossary of the National Planning Policy Framework.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of the identified heritage asset's significance. Some of the more recent designation records are more helpful as they contain a fuller, although not exhaustive, explanation of the significance of the asset.

Paragraph 9: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

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

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its

curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust 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 or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development 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.

Paragraph 15: What is a viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also the future conservation of the asset. It is obviously desirable to avoid successive harmful changes carried out in the interests of repeated speculative and failed uses.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

The optimum viable use may not necessarily be the most profitable one. It might be the original use, but that may no longer be economically viable or even the most compatible with the long-term conservation of the asset. However, if from a conservation point of view there is no real difference between viable uses, then the choice of use is a decision for the owner.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused provided the harm is minimised. The policy in addressing substantial and less than substantial harm is set out in paragraphs 132 – 134 of the National Planning Policy Framework.

Paragraph 20: What is meant by the term public benefits?

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

The purpose of the Good Practice Advice note is to provide information on good practice to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the relate guidance given in the National Planning Practice Guide (NPPG).

Note 2 'Managing Significance in Decision-Taking'
This note provides information on:

assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

It states that:

The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.

In their general advice on decision-taking, this note advises that:

Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest.

Paragraph 6 highlights the NPPF and NPPG's promotion of early engagement and pre-application discussion, and the early consideration of significance of the heritage asset in order to ensure that any issues can be properly identified and addressed. Furthermore, the note advises that:

As part of this process, these discussions and subsequent applications usually benefit from a structured approach to the assembly and analysis of relevant information. The stages below indicate the order in which this process can be approached – it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate.

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;

5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The Assessment of Significance as part of the Application Process

Paragraph 7 emphasises the need to properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process, in order to form a successful development, and in order for the local planning authority to make decisions in line with legal objectives and the objectives of the development plan and the policy requirements of the NPPF.

8. Understanding the nature of the significance is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

9. Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

10. Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives.

11. To accord with the NPPF, an applicant will need to undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.

Historic England: Conservation Principles and Assessment (2008)

Conservation Principles (2008) explores, on a more philosophical level, the reason why society places a value on heritage assets beyond their mere utility. It identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. These values can help shape the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.

Cumulative Impact

28 The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape.

Listed Building Consent Regime

29. Change to heritage assets is inevitable but it is only harmful when significance is damaged. The nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be needed if it is to go ahead. In the case of listed buildings, the need for owners to receive listed building consent in advance of works which affect special interest is a simple mechanism but it is not always clear which kinds of works would require

consent. In certain circumstances there are alternative means of granting listed building consent under the Enterprise & Regulatory Reform Act 2013.

Opportunities to Enhance Assets, their Settings and Local Distinctiveness

52. Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.

Design and Local Distinctiveness

53. Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size
- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

The London Plan Policies (Further Alterations to the London Plan (FALP) 2016)

In March 2016, the Mayor published (i.e. adopted) the Further Alterations to the London Plan (FALP). From this date, the FALP are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the development plan for Greater London.

The London Plan has been updated to incorporate the Further Alterations. It also incorporates the Revised Early Minor Alterations to the London Plan (REMA), which were published in October 2013 and March 2015.

Policy 7.8: Heritage Assets and Archaeology

Strategic

A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D. Development affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.

Policy 7.9: Heritage-led regeneration

Strategic

A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration.

This includes buildings, landscape features, views, Blue Ribbon Network and public realm.

Planning decisions

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

London Borough of Camden

Camden Council's Local Policy (2010) has the following policy which is relevant to the proposals outlined in this report:

CS14 - Promoting high quality places and conserving our heritage
The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

a) requiring development of the highest standard of design that respects local context and character; b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
c) promoting high quality landscaping and works to streets and public spaces;
d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible.

Camden Council's Development Policies (2010) has the following policies which are relevant to the proposals outlined in this report:

DP24 – Securing high quality design
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:

a) character, setting, context and the form and scale of neighbouring buildings;
b) the character and proportions of the existing building, where alterations and extensions are proposed;
c) the quality of materials to be used;

d) the provision of visually interesting frontages at street level;
e) the appropriate location for building services equipment;
f) existing natural features, such as topography and trees;
g) the provision of appropriate hard and soft landscaping including boundary treatments;
h) the provision of appropriate amenity space; and
i) accessibility.

DP25 – Conserving Camden's heritage

Conservation Areas
In order to maintain the character of Camden's conservation areas, the Council will:

a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

Listed Buildings
To preserve or enhance the borough's listed buildings, the Council will:

e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
g) not permit development that it considers would cause harm to the setting of a listed building.

Appendix III

List of Plates and Endnotes

List of Plates

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14. End Elevation, Eastern Wing (DIA, 2017)
15. Side Entrance Door (DIA, 2017)

Endnotes

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