

Donald Insall Associates

Chartered Architects and Historic Building Consultants

St Martin's Almshouses, Bayham Street, NW1 0BD

Historic Building Report
for Mr and Mrs Knutson

July 2017



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Ordnance Survey map with the site marked in red.

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Contact Information

Victoria Perry (Associate)

E: victoria.perry@insall-architects.co.uk

T: 020 7245 9888

Sarah Bridger (Historic Buildings Advisor)

E: sarah.bridger@insall-architects.co.uk

T: 020 7245 9888

Hannah Armstrong (Research Assistant)

E: hannah.armstrong@insall-architects.co.uk

T: 020 7245 9888

London Office

12 Devonshire Street

London, W1G 7AB

www.insall-architects.co.uk

1.0 Summary of Historic Building Report

1.1 Introduction

Donald Insall Associates was commissioned by Mr and Mrs Knutson in December 2016 to assist them in the preparation of proposals for St Martins Almshouses, Bayham Street NW1 0BD. 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 for change to the building by Moxon Architects. Section 4 provides a justification of the scheme according to the relevant planning policy and guidance.

1.2 The Building and its Legal Status

9 St Martins Almshouses is listed at Grade-II together with the terrace numbering 1-9 St. Martins Almshouses. The building is located in the London Borough of Camden and is within the setting of the Grade-II listed former Chapel to the almshouses and the Camden Town Conservation Area, which borders the western side of Bayham Street (see map).

The proposals will require listed building consent and planning permission. The statutory list description is included in Appendix I and extracts from the relevant planning policy documents are in Appendix II.

Map showing adjacent listed buildings in blue, adjacent conservation area in red



The Planning (Listed Buildings and Conservation Areas) Act 1990 is the 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 have *'special regard to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess; and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas'*.

In considering applications for listed building consent or planning permission, local authorities are also required to consider the policies on the historic environment set out in the National Planning Policy Framework. At the heart of the Framework is *'a presumption in favour of sustainable development'* and there are also specific policies relating to the historic environment. The Framework requires local authorities to *'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'*. The Glossary to the National Planning Policy Framework defines a heritage asset 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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

The Framework, in paragraph 128, states 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.

Section 1.3 of this report – the assessment of significance – meets this requirement and is based on the research and site surveys presented in sections 2 and 3, which are of a sufficient level of detail to understand the potential impact of the proposals.

The Framework also, in paragraph 132, requires that local planning authorities, when considering the impact of a proposed development on the significance of a designated heritage asset, should give *'great weight ... to the asset's conservation'* and that *'the more important the asset, the greater the weight should be'*. The Framework goes on to state that:

... 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.

Section 4 provides this clear and convincing justification.

The Framework requires that local planning authorities categorise harm as either '*substantial*' or '*less than substantial*'. Where a proposed development will lead to '*substantial harm to or total loss of significance*' of a designated heritage asset, the Framework states, in paragraph 133, that:

... local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: the nature of the heritage asset prevents all reasonable uses of the site; and no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.

Where a development proposal will lead to '*less than substantial harm*' to the significance of a designated heritage asset, the Framework states, in paragraph 134, that:

... this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

In relation to the consideration of applications for development affecting the setting of a designated heritage asset, paragraph 137 of the document states the following:

Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

1.3 Assessment of Significance

Constructed in 1817 to the designs of Henry Hake Seward, 9 St. Martin's Almshouses, together with the adjoining terrace, is of high significance as a good example of a purpose-built early-19th century almshouse in central London. Built specifically for the widows and spinsters of the Parish of St Martin's in the Fields, the almshouses originally accommodated roughly forty women in nine separate houses. Each house had four rooms on the ground and first floor with a central entrance and stair, and each room was equipped with its own fireplace and window. Designed by Hake in a neo-classical style the handsome front elevation, which is of primary significance, is typical of the restrained architecture of the period.

In c.1881 and 1889 the almshouses were extended and refurbished to the designs of Henry Jacques, who also enlarged the site with a chapel, infirmary and matron's residence situated at the rear on the site of the disused burial ground of St Martin's Church. During this time no. 9 was provided with a rear scullery wing extension and first floor W.C extension, the latter of which has since been removed and in-filled with contrasting modern brick and poor quality French doors that detract from

the significance of the rear elevation. The late-19th century scullery wing extension, a rudimentary brick addition of little architectural merit, has also been heavily altered with new windows and an unfortunate rear door.

The original plan form of the building was also altered in the late-19th century, though the broad cellular layout survives. In 1889 the ground floor staircase was extended into the entrance hall. Archival and on-site evidence indicates that the ground floor flight was reconstructed and extended by three treads around a new half-landing, though the existing balustrade was re-used and extended. The alterations to the staircase resulted in changes to the layout of the ground floor, with the entrances to the rear rooms being blocked and new doors inserted from the front rooms. The floor plan at first floor level also appears to have been altered at this time when a new partition was constructed at the front of the first floor, blocking the central window. In addition, the basement was altered in the late-20th century when the floor level was substantially raised by the insertion of a concrete slab, which has impacted on the proportions and head height to such an extent the basement is virtually uninhabitable.

The special interest of 9 St Martin's Almshouses is manifest in the historic fabric, which has the following hierarchy of significance:

Of **highest significance** and particularly sensitive to change is:

- The front elevation and side elevation, not including the mid-20th century replacement sash windows and detracting wiring/alarm boxes;
- The original elements of the rear elevation, though the elevation as a whole has been heavily compromised with a modern first floor door, brick infill and later scullery wing extension.

Of **high significance** and also sensitive to change is:

- The original cellular plan form, where this survives, including original chimneybreasts at basement-to-first floor level;
- The original basement stone staircase, not including the modern timber handrail;
- The original floor and roof structure

Of **moderate significance** and therefore broadly adaptable are:

- The heavily-altered late-19th century scullery wing extension;
- The late-19th century internal fittings, including doors and architraves at ground and first floor level;
- The original but heavily-altered main staircase which was partially reconstructed and extended in the late-19th century.

Of **neutral significance**, neither contributing to nor detracting from the significance of the whole and therefore highly adaptable are:

- Mid-20th century replacement sash windows on the ground and first floor of the front elevation and first floor of the rear elevation;

- The modern interiors including the kitchen and bathroom fittings, skirtings, cornices and ground floor doors;
- The modern chimneypieces at ground floor level.

Factors which **deduct** from the building's significance and should therefore, wherever possible, be removed or improved upon are:

- The clutter of wiring, alarm boxes and lights attached to the front and side elevations;
- The concrete floor at basement level which has truncated the bottom tread of the original basement staircase and reduced the head height to such a extent the floor is uninhabitable;
- The modern balusters and support to the main staircase.

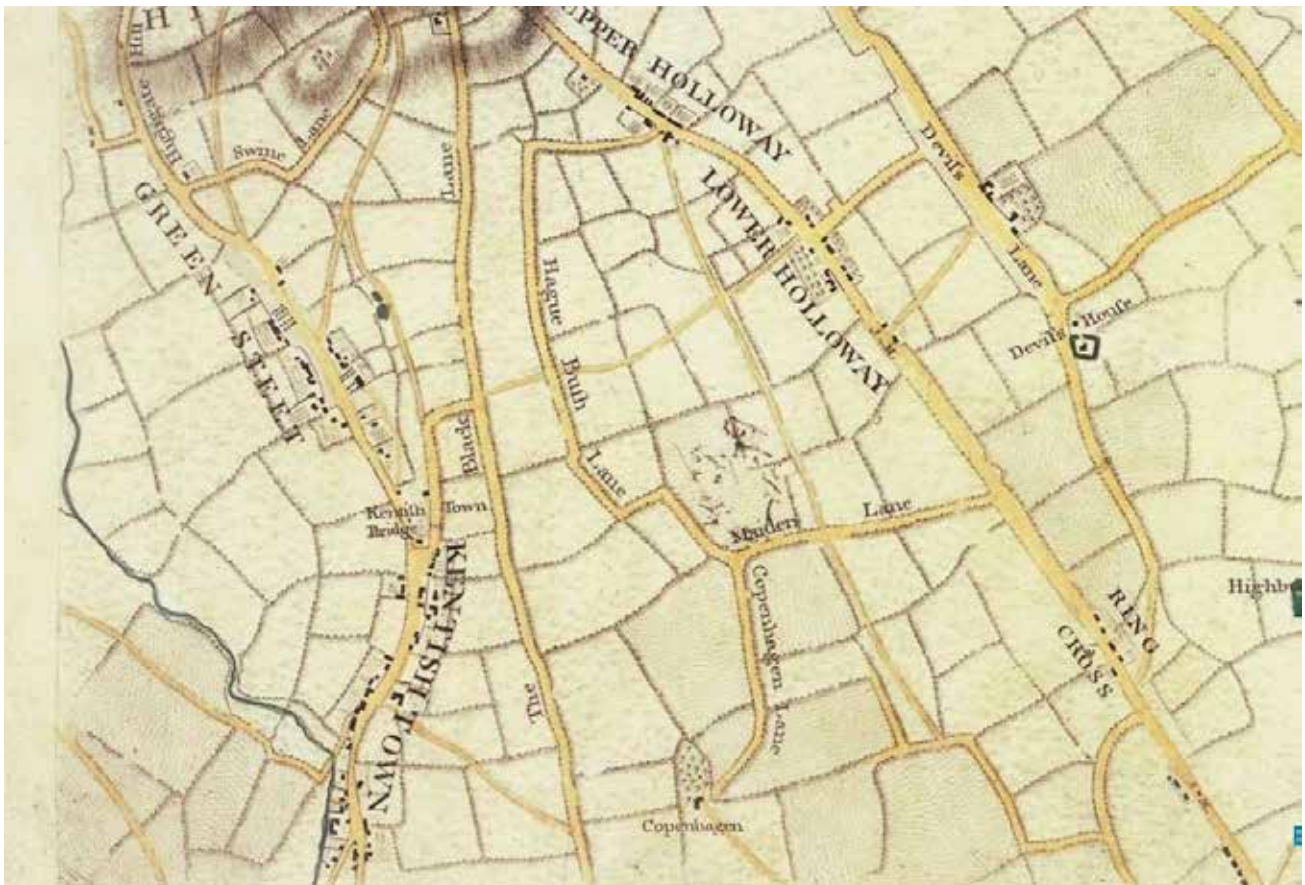
2.0 Historical Background

2.1 The Development of Camden Town

Camden Town, initially arable land situated on the outskirts of central London [Plate 1], was not developed until the late-18th century when Charles Pratt, Earl of Camden laid out streets on his land to the east of what is now Camden High Street. He employed the renowned 18th century architect and surveyor George Dance Junior to develop the street plan, who prepared an ambitious Neo-Classical scheme composed of a link crescent and oval, with a larger circus to the north east.¹ Tompson's 1801 map of St Pancras shows that a considerable amount of building had occurred along Camden Town (now Camden High Street) [Plate 2].² Pratt Street and King Street had also been laid out, running east of Camden Town. By 1849, the area had been built up and predominately consisted of terraced housing with individual gardens to the rear [Plate 3]. Camden Town Church and St Martin's Burial Ground also appear on this map between the newly introduced Bayham Street, Pratt Street and Camden Street.³

By the late-19th century Camden was a well-established town. A tramline had been introduced running north towards Kentish Town and pockets of industry had been established adjacent to the railway line. The 1894 OS map shows that the town had been developed with municipal buildings including banks, churches and schools, and recreational establishments had also been developed including a number of public houses, a drill hall and a music hall [Plate 4].⁴ During the early-20th century, development focused on the foundation of industrial and commercial firms and a printing works had been constructed opposite St Martin's Almshouses on the western side of Bayham Street [Plate 5].⁵

1. John Rocque, *An exact survey of the cities of London, Westminster and Southwark* (1761), LMA

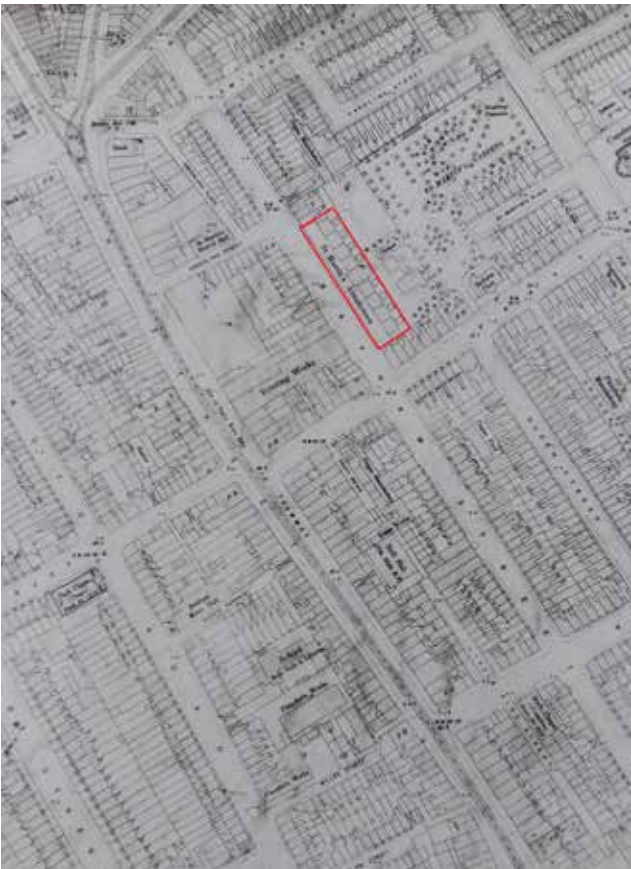




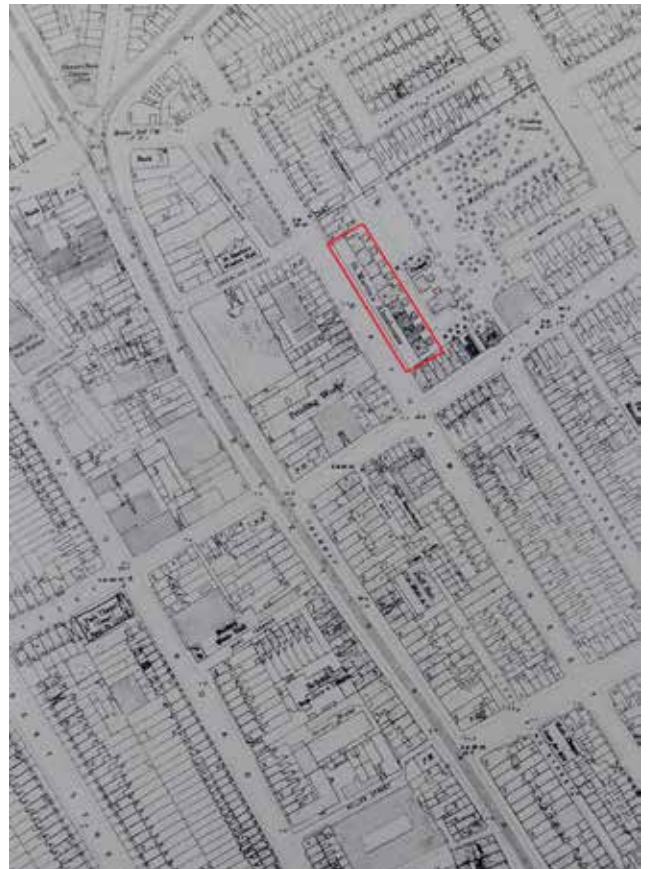
2. J. Tompson, *Map of Camden (1801)*, Camden Archives



3. *Map of St. Pancras Parish (1849)*, Camden Archives



4. *London Ordnance Survey Map (1894)*, Camden Archives



5. *London Ordnance Survey Map (1934)*, Camden Archives



The London County Council Bomb damage map shows that Camden Town experienced less bomb damage from the Blitz raids in comparison to other parts of the city [Plate 6].⁶ The majority of buildings east of Camden Town were unharmed, with the exception of a few houses on Camden Street and a block between Pratt Street and Greenland Street. Camden Town still maintains much of its 19th and early-20th century character with a mixture of industrial and commercial buildings.

2.2 The Historic Development of the Almshouse

The history of the almshouse can be traced back to the medieval period when the almshouse, bedehouse, hospital or 'maison dieu' were used for the provision of long term shelter for people in need. The construction of the almshouse appears to have arisen as a result of Christian duty, which dictated that people of the faith cared for people in need, particularly the sick, poor and widowed.⁷

The first buildings closely resembled barns and the walls were often lined with beds with a chapel located at the east end of the building, thereby ensuring that both physical and spiritual needs were attended to under one roof.⁸ Most of the early medieval hospitals or almshouses were lost during the reformation but notable surviving examples include St Mary's in Chichester, Sussex, St John's in Lichfield, Staffordshire and Gaywood Road Almshouses in Kings Lynn, Norfolk.⁹

The concept of the almshouse has endured throughout the centuries. The institutions were paid for by donors including members of the royal family, aristocracy, church dignitaries, high ranking professionals and wealthy merchants, many of whom believed that the act of their good deed would ensure their passage to heaven.¹⁰ The size of almshouses were dependant on the wealth and stipulations of the donor, however most were erected in pleasant surroundings and constructed in rows around a courtyard, reminiscent of monastic cloisters.¹¹ At the centre of a site there were often chapels or masters' houses. Almshouses tended to

be occupied by the room, which were each equipped with a fireplace and a window for natural ventilation.

A room within an almshouse was allocated by the donor or foundation who assumed the running of the site. Donors often had clear ideas about the type of establishment they wanted to set up and generally dedicated them to a specific cause. Despite strict criteria for admission, places were usually in high demand as they offered an escape from poverty.

Today, there are roughly 1,700 almshouse charities that operate in Britain, 30% of which occupy listed buildings.¹² Notable London almshouses include St Pancras Almshouses, 1-13 Southampton Road (Grade II), Geffrye Almshouses 136 Kingsland Road, now the Geffrye Museum (Grade I) and Trinity Green Almshouses, Mile End Road (Grade I).

2.3 St Martin's Almshouses

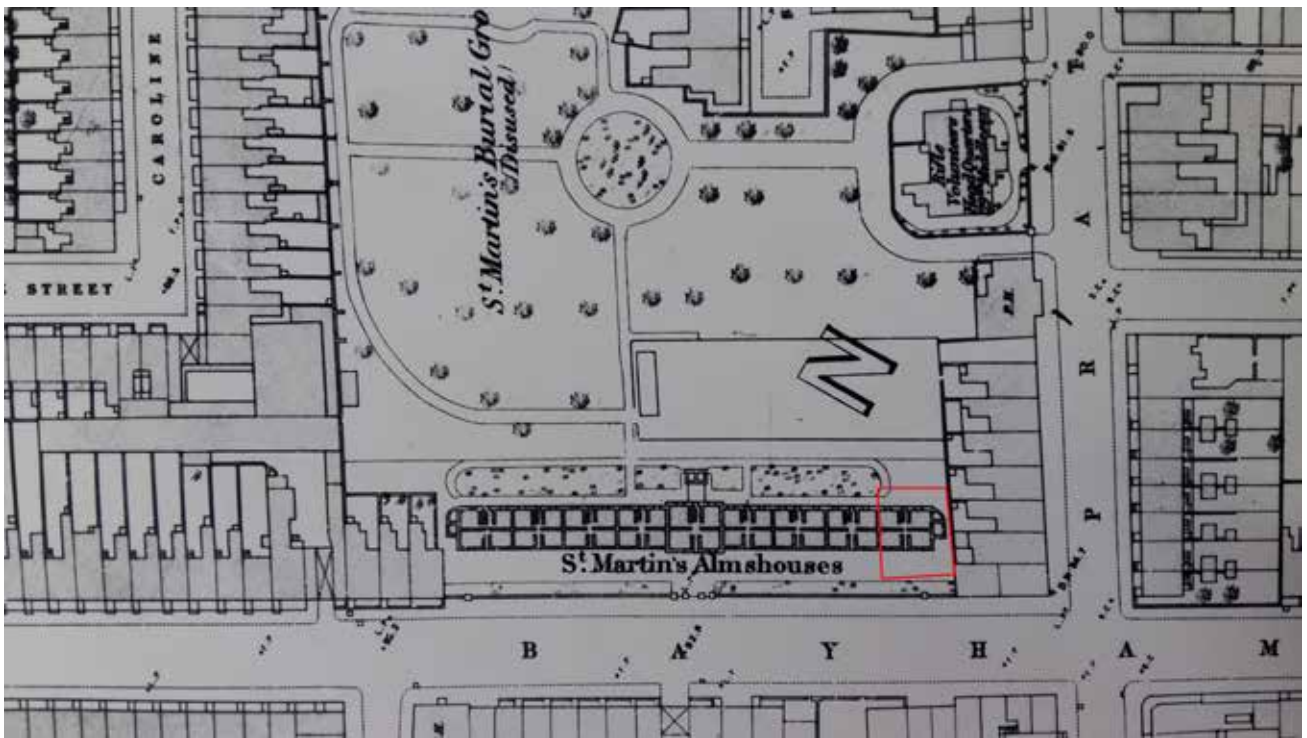
In 1803, 3¾ acres of land east of Camden Town and north of Pratt Street was acquired by the Trustees of the parish of St. Martin-in-the-Fields in Trafalgar Square, under an Act of Parliament, to provide an additional burial ground for its parishioners. In 1817 the trustees employed the architect Henry Hake Seward to design a terrace of almshouses on the western side of the plot of land. The almshouses were intended to house widows and spinsters of the parish of St Martin's in the Fields and originally accommodated roughly forty women in nine separate houses.¹³ The builder John Tomling was awarded the contract to build the almshouses and the specification of works, prepared by the architect, notes that central and end houses had basements.¹⁴



7. Detail of Map of St. Pancras Parish (1849) showing 9 St Martin's Almshouses outlined in red, Camden Archives

The almshouses are first shown in a map of 1849, situated on the east side of Bayham Street [Plate 7].¹⁵ The block consisted of nine two-storied houses, with a pediment over the central house at no. 5. The terrace principally faced onto Bayham Street but appears to have had a private garden at the rear that backed onto the burial ground. The map also suggests that there was a trench or lightwell at the rear of the terrace, marked as a dark black line, which would have provided light to the basement rooms.

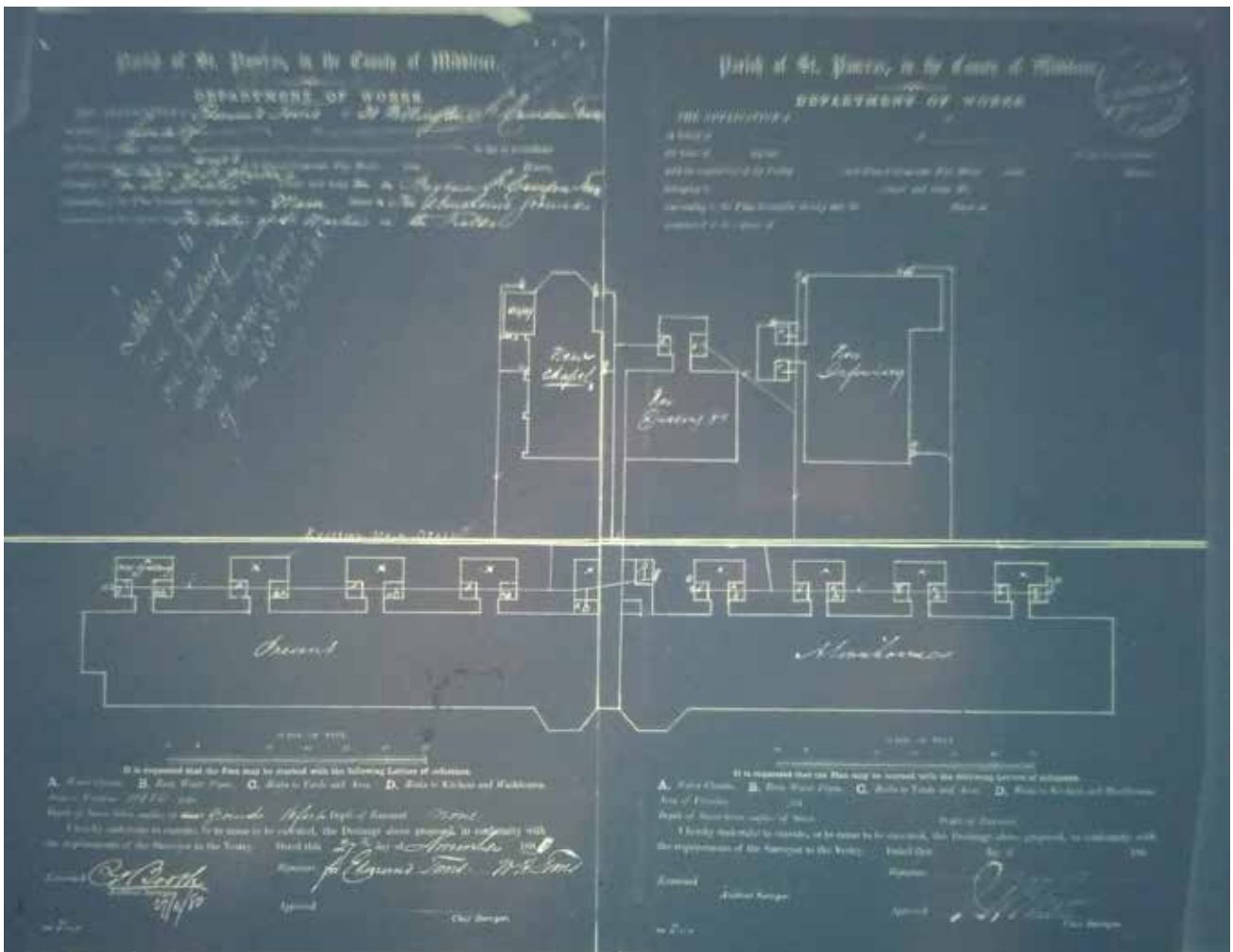
A map of 1870 shows the buildings in greater detail [Plate 8].¹⁶ At ground floor level each house had a central hallway, two front and rear rooms lit by a single window and accessed from individual doorways, and a small staircase at the rear. The map also shows that corner projections adjoined nos. 1 and 9 together with small external rooms, which are likely to have been used as privies. Both nos. 1 and 9 also had curved walls facing onto St Martin's Burial Ground, suggesting that the terrace was designed with two formal elevations. A late-19th century photograph of the almshouses shows that the front of the terrace was separated from the street by railings, which incorporated gated piers at the centre with garden beds behind [Plate 9]. The photograph also shows that the almshouses originally had three windows at the front of each building at first floor level, though all of the central windows appear to have been blocked by the turn of the century.¹⁷



8. Detail of the London Ordnance Survey Map (1870) showing 9 St Martin's Almshouses outlined in red, Camden Archives

9. Late-19th century photograph of 1-7 St Martin's Almshouses showing the original central windows at first floor level, Camden Archives





10. Drainage site plan of 1-9 St Martin's Almshouses showing the outline of the rear scullery wing extensions (1881), Camden Archives

According to architectural historian Nikolas Pevsner, the almshouses were altered and refurbished in 1881.¹⁸ Drainage Plans dating to c.1881 show that the alterations comprised the extension of scullery wings at the rear of each almshouse, which appear to have included toilets and sinks. In addition, a chapel, infirmary and matrons residence were constructed at the rear of the site on the disused burial ground [Plate 10].¹⁹ These buildings were constructed for the sole purpose of providing the residents with private healthcare and a place for religious devotion. The statutory list description notes that the buildings were designed by the architect Henry Jacques, who may have also been responsible for the extension and alteration of the almshouses.²⁰ Indeed, the materials used in the scullery wings - stock brick with red brick dressings - are extremely similar to the materials Jacques employed on the chapel and infirmary. The alterations undertaken in c.1881 are first depicted on the 1894 OS map, which also shows that St Martin's Burial Ground had been extensively developed and renamed St. Martin's Gardens [Plate 11].²¹



11. Detail of the London Ordnance Survey Map (1894) showing 9 St Martin's Almshouses outlined in red, Camden Archives

RULES AND REGULATIONS

TO BE OBSERVED AT THE

ALMSHOUSES.

1. All persons elected to the Almshouses are to reside continuously in their rooms, and are not permitted to leave unless the permission of the Matron is previously obtained.
2. They are required to maintain the qualification by means of which they received their appointment, namely, that of being "persons of good character."
3. Cases of drunkenness or misconduct are to be reported by the Matron, and will be severely dealt with by the Trustees.
4. The Chaplain performs Divine Service, with a Sermon, once on Sundays, and holds a short Service on Thursday Evenings.
5. The Matron is to open the gates at 7 o'clock every morning, and lock the same at night at 10 o'clock, from Michaelmas to Lady Day, and to open the gates at 6 o'clock and close them at 10.30 o'clock from Lady Day to Michaelmas.
6. No Almswoman may expose anything out of her window (pots of flowers excepted), nor may she hang up clothing to dry except upon the ground allotted for that purpose.
7. They are to keep their rooms in a cleanly condition, and repair, at their own cost, any windows they may break.
8. No person may throw any Ashes, Dirt, or Rubbish whatever out of the front or back of the Almshouses, but shall deposit the same in the Dust Bins, and all Slops must be thrown down the Sinks.
9. No person may allow any Visitor to remain with her after the times appointed for closing, except by permission of the Matron.
10. Any Almswoman who may come into possession of property must give notice of the same to the Trustees, and if, in their opinion, it is sufficient for the maintenance of the recipient, her appointment will be cancelled.
11. No Dogs, Cats, or other domestic animals may be kept by any of the Inmates, and they shall not encourage nor harbour temporarily any animals which may stray into the grounds.
12. The Trustees hope the Inmates will regularly attend the Services which have been provided for their spiritual benefit, but if any of the Inmates desire to attend other places of Divine Worship, they are at liberty to do so.

By Order,

G. W. MURNANE,

July, 1898.

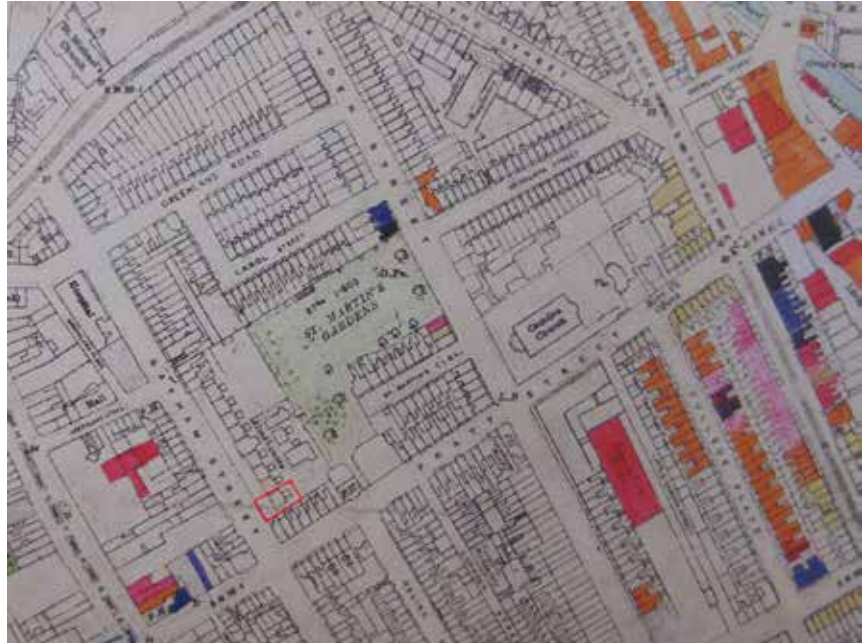
Clerk and Receiver.

NOTES.—The Matron is required to see that the above Rules and Regulations are conspicuously hung in all corridors, and should they be removed to immediately report such removal to the Trustees.

The Trustees also give notice that they reserve to themselves the right of removing any offender who commits any breach of the foregoing Rules and Regulations.

In the late-19th century strict rules and regulations were published for the residents to observe, who were referred to as 'almswomen'. The rules were strict and stated that the women were required to 'maintain the qualification of which they received their appointment, that of being persons of good character' [Plate 12].²²

The London County Council Bomb Damage Maps shows that the almshouses were not damaged during the Blitz raids of the Second World War and aside from the redevelopment of most of the rear scullery wings in the late-20th and early-21st century, the almshouses have remained largely unchanged [Plate 13].²³



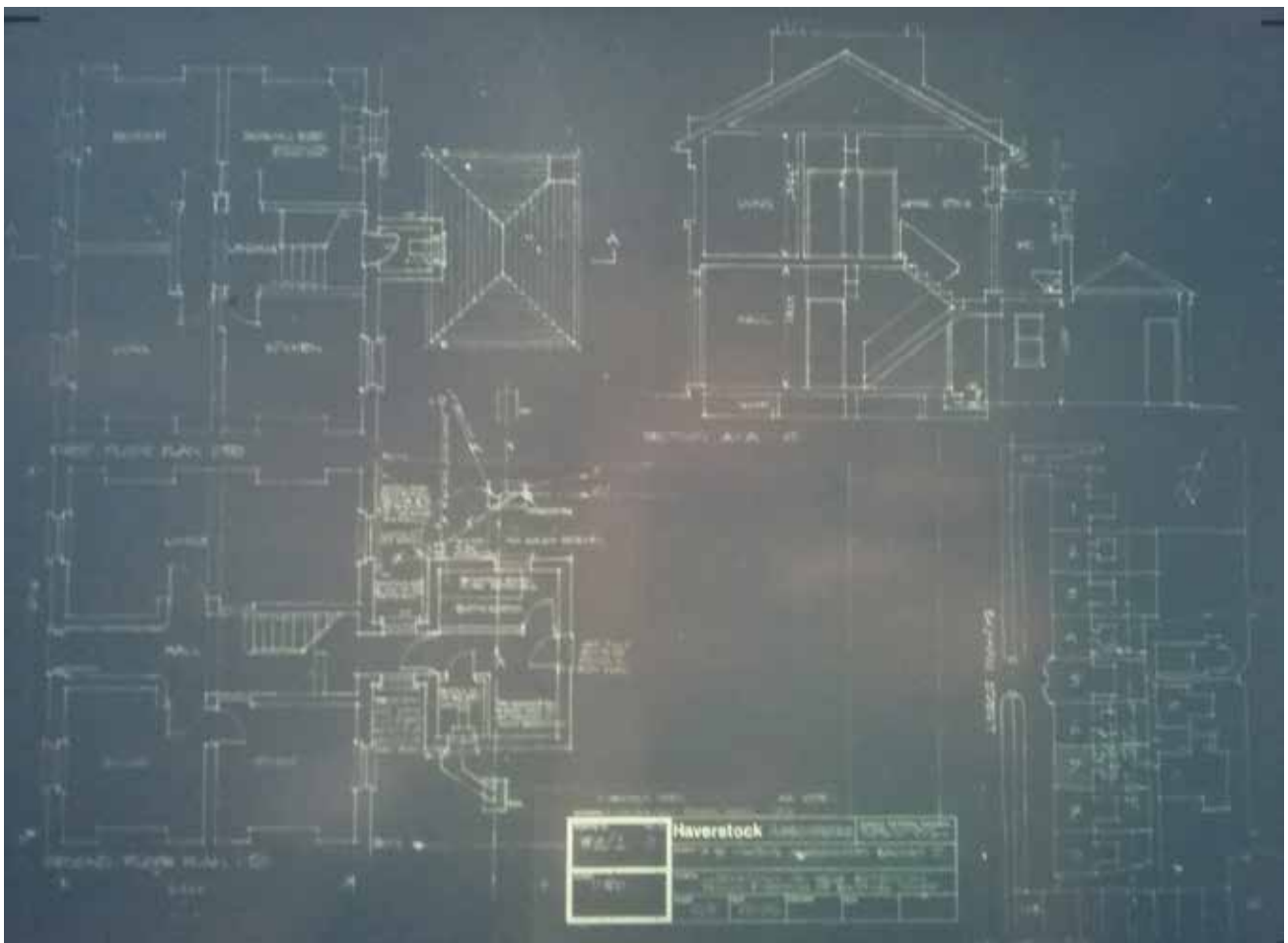
13. Detail of the London County Council Bomb Damage Map (1939-45) showing 9 St Martin's Almshouses outlined in red, Camden Archives

2.4 9 St Martin's Almshouses

When first constructed in 1817, 9 St. Martin's Almshouses appears to have been flanked by a small external privy, mirrored on the north side of no. 1 [Plate 8].²⁴ Seward's original specification of works notes that nos. 1, 5 and 9 were constructed with basements that were originally intended to house tanks for privies. The specification states that the ground was excavated no less than seven feet, which suggests that the pit must have taken up a portion of the basement rather than whole floor. Both nos. 1 and 9 were also adjoined by curved walls facing onto St Martin's Burial Ground, suggesting that the privies were screened and the terrace was designed with two formal elevations. The curved wall and privy adjoining no. 9 appear to have been removed when the building was extended with a scullery wing in c.1881, which originally incorporated a sink and separate toilet [Plate 10].²⁵ Comparison with the 1870 map shows that the rear of no. 9 originally incorporated two single windows at ground floor level and a door at the rear of the staircase. The scullery wing was accessed from the rear doorway and was set away from the original elevation, leaving the existing windows exposed.

The London Ordnance Survey Map of 1870 is likely to show the original layout of the ground floor of no. 9 which had two front and rear rooms, each

with their own doorway, a central entrance and narrow rear staircase.²⁶ The doorways to the rear rooms have since been blocked, though the apertures remain on the inside of the room, and the staircase has been extended over the former northern doorway. Although no drainage plans for no. 9 have been located in the archive, drainage plans for nos. 6 and 7 show that identical alterations were carried out to these properties, which also included the construction of a W.C extension situated on top of the ground floor link to the scullery wing [Plates 14 and 15].²⁷ A schedule of works and running costs suggests that these works were undertaken in 1889, a few years after the buildings were extended. The schedule notes that slate lean-to roofs were taken off and new flat roofs were constructed between the 'washhouse (scullery wing) and the main building', together with a new cistern enclosure.²⁸ The schedule also notes that new landings were constructed, presumably to access the rear W.C, and the staircases were extended with 9 inch strings and dado rails. On-site inspections have shown that the staircase within no. 9 was extended by three treads, while the existing balustrade was re-used and extended with new balusters. In addition, the W.C extension has since been removed but there scars in the brickwork and evidence of rebuilding to suggest where it was originally located.

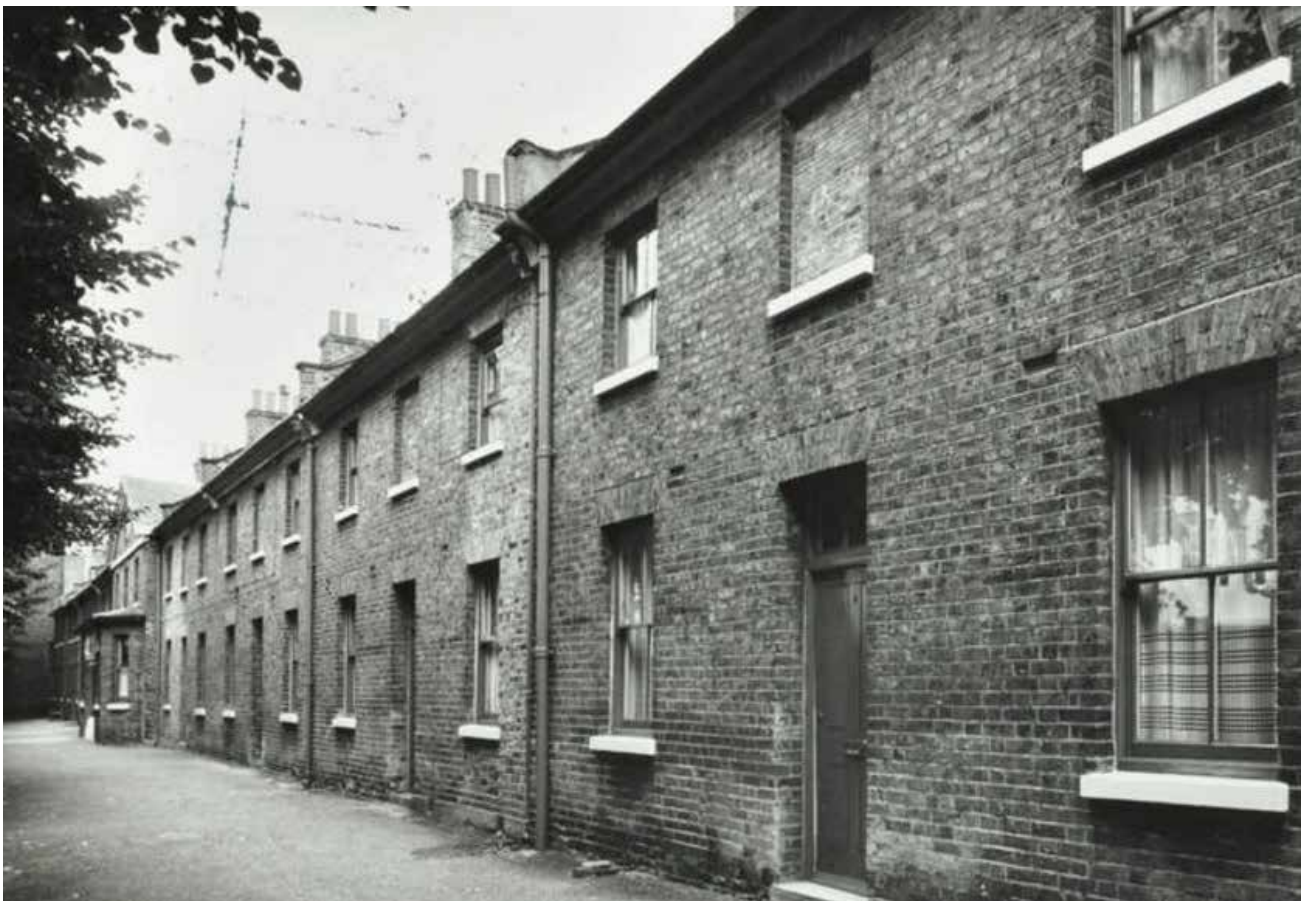


15. Ground and first floor plan and section of 7 St Martin's Almshouses (1982), Camden Archives

Additional alterations to the ground floor have included the removal of most of the partition wall between the northern front and rear room and the insertion of a doorway between the the southern front and rear rooms. It seems likely the creation of the doorway was carried out in connection with the 1889 alterations to ensure the rear room was still accessible, though it is not clear if the demolition of the northern partition was also carried out at this time or was undertaken at a later date.

The layout of the first floor also appears to have been altered. A late-19th century photograph of the almshouses suggests that that there were originally three windows on the front elevation of each building at first floor level. This suggests that the layout at the front of the first floor has been altered where a partition now cuts across the window [Plate 9].²⁹ In the absence of any development plans it is not entirely clear when this alteration took place, but given that all of the almshouses now have this pattern it suggests that this was a ubiquitous alteration most probably undertaken in connection with the late-19th century programme of refurbishment and extension [Plate 16].

16. *Photograph of St Martin's Almshouses showing the blocked central windows at first floor level (1975), Collage*



2.4.1 20th Century Development

During the Second World War the basement of no. 9, together with the basements in nos. 1 and 5, were used as air raid shelters and local residents recall that they were strengthened with steel supports.³⁰ Despite precautions, no damage was caused to the terrace during the Blitz Raids. In the late-20th century the basement floor of no. 9 was raised with modern concrete, truncating the bottom tread of the original basement staircase and reducing the head height to such an extent the floor is virtually useable.

Other than the raised basement floor, only very minor alterations appear to have been carried out in the late-20th century including the removal of the first floor W.C extension and the insertion of a sliding door in the rear elevation of the scullery wing extension.³¹ The building otherwise retains much of its original external character and layout, though most of the internal fixtures and fittings have also been removed or replaced.

2.5 The Architect: Henry Hake Seward (1778-1848)

Henry Hake Seward (1777/8-1848) received his training in the office of the architect Sir John Soane (1753-1837) from 1794-1808. He served as District Surveyor to the Parishes of St Martin-in-the-Fields and St Anne's, Soho from 1808. Other significant roles included Surveyor to Greenwich Hospital from 1821, Assistant Surveyor-General and Cashier of the Office of Works from 1823 and Surveyor of Works and Buildings from 1832-44. The majority of his works were predominantly ecclesiastical. Listed buildings by Seward include the Church of St John the Evangelist, designed in 1809 for the Earl of Ailesbury (Grade II), the Church of St Aidan, (Grade II), Greystead Rectory (Grade II), Thorneyburn Rectory (Grade II) and Church of St Luke (Grade II), all of which were built in 1818 for the Commissioners of Greenwich Hospital.

2.6 Sources and Bibliography

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Collage City of London Photograph Collection

Maps

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Camden Local Archives

Late-19th century photograph of 1-7 St Martin's Almshouses

Photographs of St. Martin's Almshouses, July 1974 and November 1980

Drainage Plans

c.1881 site drainage plan of St Martin's Almshouses

c.1881 floor plans and sections of 6 and 7 St Martin's Almshouses

Maps

J. Tompson, Map of Camden (1801)

Map of St. Pancras Parish (1849)

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3.0 Site Survey Descriptions

3.1 The Setting of the Building

Camden Town is located north-east of Regents Park between Kings Cross and Kentish Town. The area has a busy commercial core surrounded by quieter residential streets. At the heart of Camden Town is Camden High Street, an ancient north-south route from which the area began to develop in the late-18th century. The area largely maintains its original late-18th and early-19th century street plan, though it has been developed with an eclectic mix of buildings in a range of architectural styles including early-19th century brick terraces, mid-19th century stucco terraces, and late-19th century gothic buildings. A number of 20th century buildings are interspersed throughout the area, mainly consisting of early-20th century factories and post-war social housing and office blocks.

Bayham Street, on which 9 St Martin's Almshouses is located, runs parallel to the east of Camden High Street and connects Camden Road in the north with Crowndale Road in the south. The west side of Bayham Street forms the western boundary of the Camden Town Conservation Area and is largely composed of early-19th century brick and stucco terrace houses and early-20th century factories. The east side of the street has been extensively redeveloped with late-20th and early-21st century social housing blocks, though the northern end of the street retains more of its historic character and there are a few early-19th century terrace houses surviving.

Directly opposite St. Martins Almshouses is no. 101 Bayham Street, an early-20th century brick and stone building of four storeys and seven bays. The front elevation is terminated with stepped gables, a typical feature of the architecture of the art deco period, and original Crittall windows also survive on the upper floors. To the south of no. 101 are three heavily altered terraced houses which have modern rendered elevations and upvc windows; a much altered early-20th century building and a single mid-19th century terraced house.

To the north of the almshouses, on the east side of Bayham Street, there are three mid-to-late 19th century brick and stucco terraces. The front elevation of the northernmost terrace has been rendered and the windows altered with upvc louvres. Although of a different scale and proportion, the terraces complement the almshouses through a shared use of stock brick and repetition of features such as projecting chimneystacks. To the south of the almshouses, immediately adjacent to no. 9, is a poorly executed pastiche of a traditional building..

To the rear or east of the almshouses is the former Chapel to St Martin in the Fields Almshouses, as well as a former infirmary and matron's residence. These buildings were constructed in c.1881 to the designs of Henry Jacques. The chapel, a single storey gothic building that has since been converted into a house, is listed at Grade-II.³² These buildings form part of the immediate setting of the almshouses and are surrounded by mature trees.

3.2 The Building Externally

3.2.1 Front Elevation



17. Front elevation of 9 St Martin's Almshouses (2016), DIA

9 St Martin's Almshouses is of two storeys, three bays and constructed of yellow stock brick in a Flemish bond [Plate 17]. The building is set back from the main road behind a high brick wall. At ground floor level there is a central entrance with a late-19th century four panelled timber door and rectangular overlight set within a gauged brick flat arched header. The entrance is flanked by two mid-20th century chain-hung two-over-two replacement sash windows, which both have original gauged brick flat arched headers and simple white-painted cills. Below the windows are a number of modern ventilation bricks that provide air into the basement. At first floor level there are three windows, the central window was blocked in the late-19th century and the outer windows have been replaced with mid-20th century two-over-two pane sashes that are of no significance. All of the windows have original gauged brick flat arched headers and simple white-painted cills. At roof level there is a plain timber fascia with a gutter above and a timber corbel to the north. Attached to the front elevation is a detracting alarm box and detracting wiring.



18. Side elevation of 9 St Martin's Almshouses (2016), DIA

3.2.2 Side Elevation

The side elevation is constructed of plain stock brick and terminates the southern end of the terrace [Plate 18]. The pitch of the roof is outlined with a decorative timber pediment. Attached to the elevation are detracting pipes, lights and wiring.

3.2.3 Rear Elevation



19. Rear elevation of 9 St Martin's Almshouses (2016), DIA

The rear elevation is of two storeys, three bays and constructed of yellow stock brick in a Flemish bond [Plate 19]. The windows at ground floor level, situated in the north and south bays, are the original six-over-six sash windows with gauged brick flat arched headers and simple white painted cills. Adjacent to the windows are two small windows with modern glass louvres. In the centre of the elevation there is projecting single storey extension which was constructed in c.1881. The extension is constructed of stock brick and has a flat roof over the link between the main building and the wing and a pitched and hipped roof to the rear. In the rear elevation there is a modern, sliding door, and within the side elevations there are modern windows set within the original late-19th century surrounds with gauged red-brick flat arched headers.

At first floor level there are two original window openings in the north and south bays, each with gauged brick flat arched headers and simple white-painted cills. The windows are mid-20th century replacements of no significance. Adjacent to the windows are two small windows with modern glass louvres. In the central bay there are modern French doors that provide access onto the flat roof of the late-19th century ground floor extension. Archival evidence suggests that there was originally a W.C extension in this location, which appears to have been removed in the 20th century and the elevation has clearly been rebuilt in modern brick. At roof level there is a simple timber fascia with a gutter above and a timber corbel to the north. To the south there is a modern downpipe.

At the rear of the building there is a paved garden which backs onto a private footpath that runs across the rear of the almshouses to the former chapel and infirmary.

3.2.4 Roof

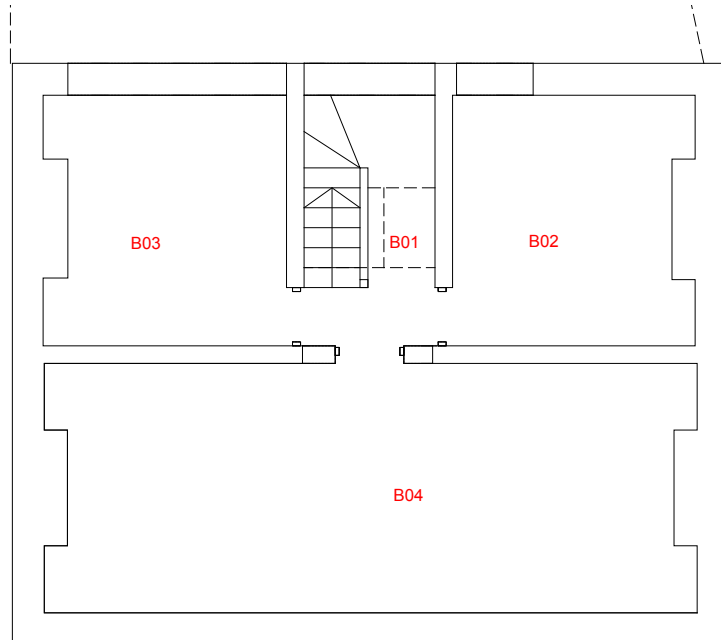
No. 9 retains its original pitched and slated roof with stock brick chimneystacks to the north and south. To the rear, the roof of the c.1881

extension is composed of a flat roof over a single-storey link connecting the original almshouse and the extension and a pitched and hipped roof over the main extension.

3.3 The Building Internally

Basement

The basement floor has been raised in the late-20th century with detracting



modern concrete. This has significantly reduced the head height of the basement and has rendered it virtually useable.

B01

Original stone staircase, the bottom tread has been truncated by the raised concrete floor. Modern timber balustrade of no significance. Brick wall to underside, partially demolished and bridged with a modern concrete lintel this detracts from the significance of the staircase.

B02

Rear room. Modern timber architrave which has been truncated at the bottom, no door. Detracting modern fireboard to ceiling. Original brick walls, the east wall has been covered with modern cement render. Coal chute in the east wall, most probably a late-19th century insertion, now blocked [Plate 20]. Original brick chimneybreast to the south with arched fireplace.

B03

Rear room. Modern timber architrave which has been truncated at the bottom, no door. Detracting modern fireboard to ceiling. Original brick walls, the east wall has been covered with modern cement render. Original brick chimneybreast to the north with arched fireplace and later inserted shelving [Plate 21].



20. Blocked coal chute at basement level, room B02 (2016), DIA

21. Original basement chimneybreast, room B03 (2016), DIA



22. Late-19th century rebuilding of the ground floor staircase, the original winders can be seen at the top (2017), DIA



23. Main staircase showing the original balustrade and three later balusters at the top of the ground floor flight (2016), DIA

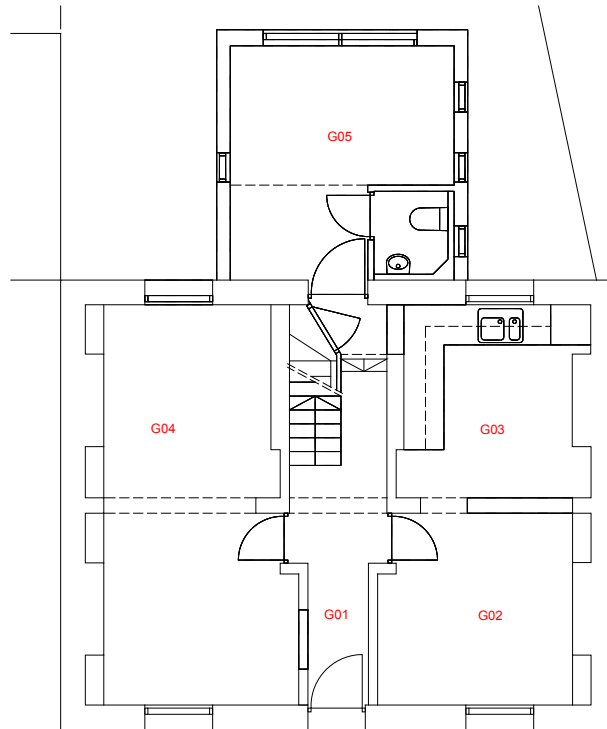
B04

Front room, most likely two rooms that have been knocked into one. Modern timber architrave which has been truncated at the bottom, no door. Detracting modern fireboard to ceiling. Original brick walls, the west wall has been covered with modern cement render. Original brick chimneybreasts to the north and south with arched fireplaces.

Main Staircase

In c.1889 the ground floor flight of the main staircase was extended towards the front of the entrance hall, cutting across the original doorway to the northern rear room. A schedule and cost of works suggests the staircase was extended to accommodate a half landing to access a rear W.C, which was situated on the roof of the link to the scullery extension. The underside of the staircase shows that this area has been rebuilt from a winder stair to a half-landing stair [Plate 22]. The original balustrade - a timber balustrade with a rounded newel, stick balusters and bun handrail - has been reused but extended with modern stick balusters where the top three treads meet the half landing, which have been rebuilt [Plate 23]. The first floor flight and balustrade appear to be original.

Ground Floor



The layout of the ground floor was altered in c.1881 when a rear extension was added and again in 1889 when the staircase was extended towards the front of the entrance hall and the openings to the rear rooms were blocked. Doorways were made in the party walls between the front and rear rooms and the partition between the northern front and rear room has been demolished.

G01

Entrance hall. Original floorboards to the front, most probably late-19th century floorboards to the rear where it steps down into the c.1881 century extension. Modern doors and architraves to G02 and G04. Late-19th century door to the basement staircase.

G02

Dining Room. modern cornice, modern skirting. Late-19th century door opening and architrave to G03, original chimneybreast to the south, modern replacement chimneypiece of no significance. Modern shelving units flanking chimneybreast, also of no significance. Late-19th/early-20th century sash to west, no architrave, modern secondary glazing.

G03

Kitchen. Original blocked doorway to the north, original six-over-six sash to the west, no architrave [Plate 24]. Blocked chimneybreast to the south. Late-19th century door opening and architrave to the west to G02. There are otherwise all modern kitchen fittings of no significance.



24. Original six-over-six sash in the ground floor kitchen, room G03 (2016), DIA



26. Original ground floor stair trimmer, now redundant due to the relocated position of the stair; (2017) DIA

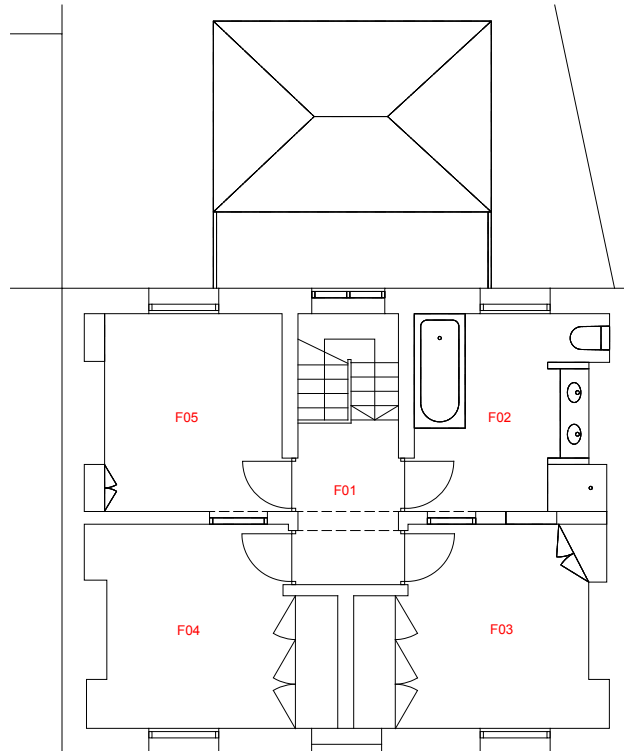
G04

Formerly two rooms, now one large room. Wall nibs and a downstand remain marking the outline of the original floor plan. Modern cornice, predominately modern skirting though a section of original skirting survives adjacent to the south-west doorway. To the north there are two chimneybreasts, both with modern replacement chimneypieces of no significance. To the east there is a small original window and an original six-over-six sash that is without an architrave. To the south-east there is an original doorway, now blocked due to the extended staircase which cuts across the opening, and to the south-west there is an original door opening with a later, most probably late-19th century, architrave. To the west there is a late-19th/early-20th century replacement sash with modern secondary glazing.

G05

Extension constructed in c.1881. Modern window to the north, modern sliding door to the east, modern W.C to the south and three modern sash windows. All modern fixtures and fittings of no significance.

First Floor



The layout of the first floor appears to have been altered in the late-19th/early-20th century when the central window at the front of the building was blocked, suggesting that the internal layout was altered when a new partition was constructed across the window. All floorboards are modern replacements.

F01

Landing. Late-19th century four-panelled doors and architraves to F02-F05. Sections of original skirting on the north and south walls.

F02

Bathroom. Late-19th century four-panelled door and architrave. Picture rail. Late-19th/early-20th century sash to the east with a modern architrave of no significance, small window, most probably original. Blocked chimneybreast to the south. Modern door to the west between F02 and F03, now locked shut. There are otherwise all modern fixtures and fittings of no significance.

F03

Bedroom. Late-19th century four-panelled door and architrave. Modern picture rail and modern skirting. Modern door to the east between F02 and F03, now locked shut. Corner cupboard, most probably a late-19th century insertion that appears to be made out of re-used window shutters [Plate 25]. Blocked chimneybreast to the south; late-19th/early-20th century sash to the west with a modern architrave of no significance. Modern built-in cupboards to the north, also of no significance.



25. First floor corner cupboard possibly made out of re-used window shutters, room F03 (2016), DIA

F04

Master bedroom. Late-19th century four-panelled door and architrave. Modern picture rail, original plain skirting to north, east and west walls. Blocked chimneybreast to the north, modern door to the east between F04 and F05. Modern built-in cupboards to the south and late-19th/early-20th century window to the west with a modern architrave of no significance.

F05

Bedroom. Late-19th century four-panelled door and architrave. Modern picture rail, predominately original plain skirting. Blocked chimneybreast to the north, small original window to the east adjacent to a late-19th/early-20th century replacement sash with a modern architrave of no significance. Modern door to the west between F04 and F05.

4.0 Commentary on the Proposals

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

The proposed scheme seeks to extend and refurbish 9 St Martin's Almshouses and sensitively upgrade the residential accommodation for 21st century use, thereby ensuring the long-term viability of the listed building in its optimum viable use as a single-family residence. The proposals are discussed in detail below.

Front elevation

It is proposed to replace the mid-20th century chain-hung sashes on the ground floor with single-glazed six-over-six sash windows to match the original configuration seen in the historic photograph in Plate 9, and to match the ground floor windows on the majority of the almshouses. The original rear window that is proposed to be removed to create an entrance to the extension would be re-used on the front elevation. It is also proposed to replace the 20th century first floor windows on a like-for-like basis, retaining the configuration of the first floor windows seen on the rest of the terrace. The 19th century entrance door would also be replaced with a six-panelled timber door more suited to the original date and character of the building. These alterations would reinstate the original design of the front elevation and enhance the significance of the listed building.

Rear elevation and extension

It is proposed to replace the rear scullery wing, which was constructed in c.1881, with a contemporary ground and basement extension. The scullery wing is of modest significance as a later rudimentary extension

9. Late-19th century photograph of 1-7 St Martin's Almshouses showing the original central windows at first floor level, Camden Archives



and it has also been heavily altered with new windows, a detracting rear door and a modern link to the main building. The demolition of the scullery wing would result in some minor 'less than substantial' harm to the significance of the listed building, but this would be mitigated through the high quality design of the proposed extension, which would be an overall improvement on the existing. The materials of the extension, brick and glass framed with timber, would complement the existing materials of the building and the re-siting of the extension to the north of the building would also expose more of the original rear elevation and remove the unattractive and redundant space that currently exists to the side of the ill-positioned central extension. The extension would provide an improved quality of floorspace, which would contribute to the long-term viability of the listed building in its optimum use as a single family dwelling. The rear garden, which is in a particularly poor state of repair, would also be re-landscaped in connection with the new extension, which would enhance the setting of the listed building.

The extension would be linked to the main building via the existing doorway to the current scullery wing and via a new dropped window opening from the western rear room. The window would be re-used and relocated to the front elevation and the opening, which is extremely narrow, would be enlarged by half a brick to each side to create a useable doorway.

The window header and character of the opening would be retained and there would be a very minimal impact on the significance of the listed building.

The rear elevation would otherwise be refurbished. The original ground floor window would be retained and the 20th century first floor windows would be replaced on a like-for-like basis, as on the front elevation. The central French doors, which were added in the late-20th century and detract from the appearance and significance of the listed building, would be removed and replaced with a single-glazed two-over-two sash window with a splayed header to match the adjacent windows. The window would be positioned slightly lower than the existing windows to ensure it could be opened from the staircase landing. The area around the window, which has been rebuilt in detracting brick, would also be rebuilt in improved stock brick to blend with the original elevation and the proposals would considerably enhance the overall appearance of the rear elevation.

Roof

It is proposed to refurbish the roof via the cleaning and re-laying of slates. All of the existing natural slates would be reused where possible and any broken slates would be replaced to match the existing to ensure the building is watertight.

This would form a beneficial scheme of repair that would contribute to the long-term conservation of the listed building and would enhance its overall significance.

It is also proposed to insert a flush conservation rooflight on the rear roof pitch to provide natural light in the roof void, which would allow the space

to be properly used as a store.

The rooflight would be appropriately located on the secondary elevation and would be scarcely visible from the rear due to the short length of the garden. It would therefore have a negligible impact on the appearance and overall significance of the listed building.

Basement

Within the basement it is proposed to lower the raised concrete floor, which is believed to have been raised in the mid-to-late 20th century, and reinstate a useable floor to ceiling height throughout, which would bring the basement back into day-to-day use. The existing stone staircase would be retained and the stair extended to the lowered floor with three new timber treads and risers. To ensure there is a consistent appearance to the staircase the whole stair is proposed to be overclad with timber. The timber would be fixed into the brick wall, which has also been covered with concrete render, rather than screwed into the stone to ensure the cladding would not damage the stair and it would be reversible in the future.

Due to an extremely high level of water ingress, it is also proposed to tank the basement in connection with the lowering of the floor. It is proposed to use a cavity membrane system which would require a plastic membrane to be fixed to the wall using plastic plugs set into the mortar joints between the bricks. The membrane would be dry lined with plasterboard and the moisture would exit through a drain in the new floor, ensuring the brick walls would be completely protected within a breathable system. To ensure the complete effectiveness of the system the chimneybreasts would also be over-lined but their form would be retained.

The concealment of the original brick wall, chimneybreasts and stone staircase would alter the character of the basement, resulting in some very minor less than substantial harm; however the alterations are required to bring the basement back into use, which would be a considerable benefit, and would be entirely reversible in the future.

The basement is also proposed to be extended at the rear underneath the proposed ground floor extension. This would improve the quality of the internal accommodation, which would support the long-term viability of the listed building in its optimum viable use as a single-family residence. A small opening is proposed in the western rear wall to access the new extension and wall nibs and a downstand would be retained to illustrate the historic layout.

The basement extension would clearly read as a new addition and would have a very minor impact on the overall significance of the listed building.

Additional alterations proposed in the basement would have a beneficial or neutral impact on the significance of the listed building. These alterations would include the construction of a shower room between the two front rooms, which would reinstate the original floor plan and enhance the significance of the listed building, and the replacement of the



23. Main staircase showing the original balustrade and three later balusters at the top of the ground floor flight (2016), DIA



26. Original ground floor stair trimmer, now redundant due to the relocated position of the stair, (2017) DIA

mid-to-late 20th century doors with new doors and architraves suited to the increased height of the basement, which would have a neutral impact. The aperture of one of the existing doorways adjacent to the staircase would be retained and glazed over to illustrate the historic changes to the layout.

Ground/basement staircase

The head-height between the ground floor and basement staircase is particularly shallow and does not meet building regulations. When the ground floor staircase was moved forward in the stair compartment in the late-19th century the former trimmer was left in-situ, which significantly impacts on the head-height of the basement stair [see Plate 26]. In order for the basement to be fully accessible it is proposed to cut back the trimmer and form a new trimmer around the long-established position of the staircase. This would have an extremely minor impact on the significance of the listed building through the minimal loss of historic fabric; however it would also bring about a considerable benefit allowing the basement to be fully accessible for the long-term.

The ground floor staircase would also be refurbished and the detracting modern baluster seen in Plate 23 would be removed and replaced with a traditional stick baluster to match the rest of the staircase, which would enhance the significance of the listed building.

Ground floor

At ground floor level it is proposed to demolish the spine wall between the southern front and rear room to create a decent sized living room, and form a new door at the eastern end of the room to improve the flow around the building in connection with the proposed extension. This would result in some very minor less than substantial harm; however this would be mitigated by the retention of two substantial wall nibs and downstands, which would illustrate the original layout.

To the north of the ground floor it is proposed to subdivide the front room to create a coats cupboard, accessed from a new door off the main hallway, while the rest of the room would be converted into a study separated from the rear room by a new partition with sliding pocket doors. The alteration to the plan form would result in some less than substantial harm to the significance of the ground floor rooms; however the partitions would be fully reversible in future.

Within the kitchen the original spine wall between the front and rear room would be partially reinstated to enclose the bespoke-fitted kitchen cabinets from the rest of the room, which would allow the original plan form to be more easily inferred, thereby enhancing the significance of the listed building. The kitchen cupboards would be positioned on either side of the room and there would be a hob within the existing fireplace under a raised lintel, with the extract concealed in the flue. This would require the removal of a modern chimneypiece of no significance and the concealment of the lower half of the chimneybreast behind the kitchen cupboards. The chimneybreast would be retained behind and the form would be exposed at high level, ensuring it would remain as the central architectural feature in the room. The kitchen cupboards would be fitted using standard minimal fixings and would be entirely reversible in the future, and the alterations would cause no harm to the significance of the listed building.

It is also proposed to replace the poor quality modern chimneypieces in the ground floor front rooms and provide a new chimneypiece in the eastern rear room more suited to the original early-19th century date and character of the building. This would be wholly beneficial and would better reveal the significance of the listed building.

First floor

Minor alterations are proposed to the first floor. The modern doors between the front and rear rooms would be blocked with timber-stud partitions though the depression of the openings would be retained from the rear rooms to illustrate the historic development of the layout. This would have a neutral impact on the significance of the listed building.

It is also proposed to subdivide the southern rear room with timber-stud partitions to create an ensuite bathroom for the front bedroom, accessed via a new doorway, and a family bathroom to the rear.

The rear room has already been converted into a bathroom and it has no historic fixtures and fittings of significance. The subdivision of the space would result in some extremely minor less than substantial harm, however the stud walls and fittings would be fully reversible in future and the creation of two bathrooms would significantly improve the quality of the internal accommodation.

4.2 Justification of the Proposals

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision making on applications that relate to the historic environment. Section 66 imposes a statutory duty upon local planning authorities to have special regard to the desirability of preserving the special architectural or historic interest of listed buildings. As established in Section 2 of this report, the special architectural and historic interest of 9 St Martin's Almshouses principally resides in the external elevations and the contribution these make to the composition of the wider terrace at Nos. 1-9 St Martin's Almshouses.

As described in the preceding section, the majority of the proposals would have a beneficial or neutral impact on the special interest of the listed building but some very minor 'less than substantial harm' would be caused through the demolition of the scullery wing, the extension of the basement, tanking of the basement, the removal of the ground floor stair trimmer and minor alterations to the plan form at ground and first floor level.

The minor less than substantial harm caused by the demolition of the scullery wing, which is of modest significance as a later extension of limited architectural quality and includes detracting modern alterations, would be mitigated by the proposed design of the replacement extension, which would be an overall improvement. The new extension would be constructed in materials that would complement the existing building and the re-siting of the extension to the north would reveal more of the original rear elevation, thereby enhancing the primary significance of the building. The extension of the existing basement to connect with the proposed extension would cause some very minor less than substantial harm to the original layout of the building, though the extension as a whole would bring about a substantial benefit in providing a better quality of floorspace, which would contribute to the long-term viability of the building in its optimum viable use as a single-family residence.

The less than substantial harm caused by the proposed tanking of the basement, concealment of the original stone staircase, and removal of the original but redundant ground floor stair trimmer would be mitigated by the benefit that is contained at the heart of these proposals: bringing the basement floor back into day-to-day use. The extension of the basement staircase is fundamental to the proposed scheme and the proposed cladding of the stair with a fully reversible timber cladding system, which would be fixed into the wall rather than the stone, would ensure the stair would not be damaged and would also have a consistent appearance. The removal of the ground floor stair trimmer, which was rendered redundant when the staircase was moved forward in the late-19th century, would require the minor loss of historic fabric but this would allow for the increase in head height between the stairs to ensure the basement would be fully accessible in the long-term. Lastly, the proposed tanking is required to ensure the basement would be watertight and habitable. The original walls would be preserved within a breathable cavity membrane

system that is frequently employed on historic buildings, which would also be fully reversible in the future.

The proposed alterations to the layout of the ground and first floor would result in some less than substantial harm, primarily through the subdivision of the northern ground floor front room and southern first floor rear room. Though this would impact on the original proportions of these two rooms there are no surviving historic fixtures and fittings that would be affected and the creation of an additional bathroom, study and cupboard would make a significant contribution to the quality of the internal living accommodation, while the broad cellular layout would be retained. Where the minor demolition of walls is proposed elsewhere wall nibs and downstands would be retained to minimize the impact of the openings and preserve the overall plan form.

Consequently, though some aspects of the proposals would result in some minor less than substantial harm to the significance of the listed building, its overall special interest would be preserved in accordance with Section 66 of the Act. As the building is not situated in a conservation area, and the proposals would not have an impact on the setting of the adjacent Camden Town Conservation Area, Section 72 of the Act would not be engaged.

The proposals must also be justified in terms of the National Planning Policy Framework (NPPF) and paragraph 134 requires that any less than substantial harm caused to the significance of a designated heritage asset be weighed against the public benefits of the proposal, including securing its optimum viable use. Public benefits which follow from development can be anything that delivers economic, social or environmental progress as described in the paragraph 7 of the NPPF, and may include heritage benefits. The public benefits arising from this scheme would include:

- The enhancement of the front elevation, including the reinstatement of the original design of the elevation;
- The enhancement of the rear elevation, including the removal of the detracting modern French doors and reinstatement of a traditional sash window;
- The provision of an improved extension of a better design than the existing rudimentary extension. The proposed extension would allow for the exposure of more of the original rear elevation and would provide increased floorspace, which would also contribute to the long-term viability of the listed building in its optimum viable use;
- The repair and refurbishment of the roof slates, which would ensure the long-term conservation of the roof structure;
- The re-use of the redundant basement floor, bringing the whole floor back into day-to-day use;
- The reinstatement of the original plan form at the front of the basement;
- The refurbishment of the ground floor staircase, including the removal of the detracting modern balusters and Newel post;

- The reinstatement of ground floor chimneypieces more suited to the early-19th century date and character of the building;
- The re-landscaping of the unattractive garden at the rear of the building, which would enhance the setting of the listed building.
- The improved quality and quantum of the internal accommodation, which would make a significant contribution to the long-term viability of the listed building in its optimum viable use as a single-family residence, which would in turn contribute to its long-term conservation.

These benefits would outweigh the less than substantial harm arising from the proposed scheme, in accordance with paragraph 134 of the NPPF.

4.3 Conclusion

In accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act, the special architectural and historic interest of the Grade-II listed building would be preserved by the proposed scheme.

The NPPF places a particular emphasis on having a balanced judgment as to the scale of harm or loss versus the significance of the heritage asset. Considered against the identified significance of the listed building, the less than substantial harm arising from the proposed scheme would be outweighed by the public and heritage benefits of the proposals, which include maintaining the long-term conservation of the building within its optimum-viable use. The listed building would therefore be conserved in a manner proportionate to its significance, in accordance with paragraph 129 of the NPPF.

Appendix I

Statutory List Descriptions

St Martin in the Fields Almshouses, numbers 1-9, Bayham Street

Grade: II

Date first listed: 14 May 1974

Terraced almshouses. 1817-18. By Henry Hake Seward. For the Parish of St Martin-in-the Fields. Built by J Tomling. Yellow stock brick and slate roofs. Symmetrical 2 storey terrace. Projecting, pedimented centre (No.5) having 3 windows. Flanking houses, 2 windows each (1 blind). Centre with pink granite columns having foliated capitals and shaped imposts with trefoil enrichment supporting shallow slated roof over entrance and flanking canted bays. Panelled doors under toplights in plain surrounds. Recessed 4-pane sashes, ground floor bays with gauged red brick flat arches. Oval blind oculus in tympanum. Flanking houses with square-headed doorways, fanlights and panelled doors. Gauged brick flat arches to recessed 4-pane sashes, those above entrances being blind. Slab chimney-stacks rise from party walls. Original, shaped cast-iron rainwater heads. INTERIOR: several interiors now opened up. HISTORICAL NOTE: the almshouses were erected to house up to 70 poor widows or spinsters of the parish of St Martins-in-the-Fields. St Martin-in-the-Fields Almshouses and Chapel (qv), form a group. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, St Pancras part IV: London: -1952: 136).

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 preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Similarly, section 72(1) 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.

Where a proposed development will lead to **‘substantial harm’ to or total loss of significance** of a designated heritage asset paragraph 133 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

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.

In relation to the consideration of applications for development affecting the **setting of a designated heritage asset**, paragraph 137 of the document states the following:

Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

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' 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.³³

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.³⁴

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.

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*

Note 3 'The Setting of Heritage Assets'

This note provides guidance on the setting of heritage assets, which is separate to issues of curtilage, character or context.

The Extent of Setting

4. The setting of a heritage asset is 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.

The setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, or be quite distinct from it. Extensive heritage assets can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. I.e. A conservation area will include the settings of listed buildings and have its own setting.

Views and Setting

5. The contribution to the setting of a heritage asset can be expressed through a wide variety of views.

6. Views which contribute more to understanding the significance of the heritage asset include:

- *those where relationships between the asset and other historic assets or places or natural features are particularly relevant;*
- *those with historical associations, including viewing points and the topography of battlefields;*
- *those where the composition within the view was a fundamental aspect of the design or function of the heritage asset; and*
- *those between heritage assets and natural or topographic features, or phenomena such as solar and lunar events.*

Even if recent unsympathetic development has affected the setting or views of a heritage asset, consideration will still be given to whether developments would further detract or enhance the significance of the asset.

Setting and the Significance of Heritage Assets

9. Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset, which may vary from asset to asset.... Therefore, implications of development affecting the setting of heritage assets should be considered on a case-by-case basis.

Setting and urban design

The numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations, and often relate to townscape attributes such as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

Setting and economic and social viability

Sustainable development under the NPPF can have important positive impacts on heritage and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic and social viability of a heritage asset can be diminished if accessibility from or to its setting is reduced by badly designed or insensitively located development.

A staged approach to proportionate decision-taking

10. Protection of the setting of heritage assets need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development.

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.*

Camden Local Policy

Camden Council's planning policy (2012) has the following policies which are relevant to 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.

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.

DP27 – Basements and lightwells

In determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. We will require developers to demonstrate by methodologies appropriate to the site that schemes.

- a) *maintain the structural stability of the building and neighbouring properties;*
- b) *avoid adversely affecting drainage and run-off or causing other damage to the water environment;*
- c) *avoid cumulative impacts upon structural stability or the water environment in the local area;*

and we will consider whether schemes:

- d) *harm the amenity of neighbours;*
- e) *lead to the loss of open space or trees of*
- f) *provide satisfactory landscaping, including adequate soil depth;*
- g) *harm the appearance or setting of the property or the established character of the surrounding area; and*
- h) *protect important archaeological remains. The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.*

In determining applications for lightwells, the Council will consider whether:

- i) *the architectural character of the building is protected;*
- j) *the character and appearance of the surrounding area is harmed; and*
- k) *the development results in the loss of more than 50% of the front garden or amenity area.*

Also relevant is policy SC14 of the Camden Core Strategy (2010):

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.*

Appendix III

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Endnotes

- 1 N. Pevsner and B. Cherry, *The Buildings of England: London 4: North* (London and New Haven: Yale University Press, 2002), p.384
- 2 J. Tompson, Map of Camden (1801), Camden Archives
- 3 Map of St. Pancras Parish (1849), Camden Archives
- 4 Pevsner, *Buildings of England*, p.384
- 5 London Ordnance Survey Map (1934), Camden Archives
- 6 London County Council Bomb Damage Map (1939-45) Camden Archives
- 7 <http://www.almshouses.org/history/historical-summary/>, accessed 10 January 2017; A. Hallett, *Almshouses* (Risborough: Shire Publications, 2004), p.12
- 8 Hallett, *Almshouses*, p.6
- 9 Historic England, 'Disability in Medieval Hospitals and Almshouses', <https://historicengland.org.uk/research/inclusive-heritage/disability-history/1050-1485/hospitals-and-almshouses/>, accessed 10 January 2017.
- 10 Hallett, *Almshouses*, pp.15-18; 'Disability in Medieval Hospitals and Almshouses', <https://historicengland.org.uk/research/inclusive-heritage/disability-history/1050-1485/hospitals-and-almshouses/>, accessed 10 January 2017.
- 11 Hallett, *Almshouses*, p.23
- 12 <http://www.almshouses.org/history/historical-summary/>, accessed 10 January 2017
- 13 Pevsner, *Buildings of England*, p. 388
- 14 Contract between the Committee of the Vestry of St Martin in the Fields and John Tomling for building a row of almshouses, 13th September, 1817, Westminster Archives
- 15 Map of St. Pancras Parish (1849), Camden Archives
- 16 London Ordnance Survey Map (1870), Camden Archives
- 17 Late-19th century photograph of 1-7 St Martin's Almshouses, Camden Archives
- 18 Pevsner, *Buildings of England*, p. 388

- 19 Drainage Plan for St Martin's Almshouses (1881), Camden Archives
- 20 Historic England, 'Former Chapel to St Martin In The Fields Almshouses' [<https://historicengland.org.uk/listing/the-list/list-entry/1272269>, accessed 12 January 2016]
- 21 Detail of London Ordnance Survey Map (1894), Camden Archives
- 22 Rules and Regulations to be Observed at the Almshouses, July 1896, Westminster Archives
- 23 London County Council Bomb Damage Map (1939-45) Camden Archives
- 24 Map of St. Pancras Parish (1849), Camden Archives
- 25 Drainage Plan for St Martin's Almshouses (1881), Camden Archives
- 26 London Ordnance Survey Map (1870), Camden Archives
- 27 Drainage Plans for 6 and 7 St Martin's Almshouses (1881), Camden Archives
- 28 Vouchers for salaries, work done at the almshouses etc, 1889, Westminster Archives
- 29 Late-19th century photograph of 1-7 St Martin's Almshouses, Camden Archives
- 30 Discussion with local residents
- 31 Discerned from on-site inspections
- 32 Historic England, 'Former Chapel to St Martin In The Fields Almshouses' [<https://historicengland.org.uk/listing/the-list/list-entry/1272269>, accessed 12 January 2016]
- 33 Historic England. *Historic Environment Good Practice Advice in Planning: Note 2 – Managing Significance in Decision-Taking* (2015) p.3
- 34 Historic England. *Historic Environment Good Practice Advice in Planning: Note 2 – Managing Significance in Decision-Taking* (2015) p.5

