

3.67 The defined (formerly residential) area of the nearby Red Lion and Queen Squares was built from the late 1680s not by the Bedford Estate but by the “notorious” builder and speculator Nicholas Barbon. Red Lion Square is recorded as being in progress in 1684, when the lawyers of Gray’s Inn attempted to disrupt building activity which was then encroaching on their rural setting<sup>44</sup>. The Appraisal describes that:

*“Red Lion Square and Queen Square were first planned by Nicholas Barbon in the 1680s, on fields to the north and west of Gray’s Inn. Although much of the street pattern survives, none of the original buildings surrounding the squares are intact.”*

3.68 The name for this square and also nearby street derives from the “Red Lyon (or Lion) Inn” that was one of the most important hostelries on Holborn in the late Medieval period<sup>45</sup>.

3.69 The later 19<sup>th</sup> century saw many of Bloomsbury’s wealthy residents move to then more attractive suburbs further to the north and the area came to attract new uses and expand upon existing ones. These included industrial development in the Fleet valley as well as growing educational establishments, hospitals around Queen Square and the expansion of the British Museum. New shopping and commercial facilities were also introduced in areas such as New Oxford Street to the south. Summit House forms part of this later evolution in the use and built fabric of this urban area during the interwar period – representing a clear shift to more commercial uses around the High Holborn area and also a very different style of architecture for Bloomsbury.



**Figure 3.35: Extract of Ordnance Survey Map 1914 (prior to development of the site for Summit House in 1925)**

<sup>44</sup> Summerson, J, *Georgian London*, 1986

<sup>45</sup> *Old and New London: Volume 4*, 1878

3.70 Bomb damage during the Second World War had a very significant impact on the form and fabric of Bloomsbury, which is still appreciable today in the degree of more comprehensive post war redevelopments within and also along the fringes of the conservation area. The Bomb Damage Maps 1939-45<sup>46</sup> prepared by the London County Council clearly indicate how impacted Red Lion Square was by enemy bombing – with many buildings along the north and west sides of the square either totally destroyed or damaged beyond repair. The building on site escaped lasting damage during wartime and today retains much of its original appearance to the street, albeit within a very change context of a redeveloped square.



**Figure 3.36: Extract of Ordnance Survey Map 1951 (war damage still evident to the rear of Summit House and across the square)**

3.71 During the 20<sup>th</sup> and 21<sup>st</sup> centuries, the expansion of hospital, academic and cultural uses has continued, particularly around the University of London campus and the hospitals. Bloomsbury has also been marked by more widespread change as the area has sought to accommodate new uses and modes of transport into the city centre, such as the large scale infrastructure of the Euston Road to the north.

### **Character and Appearance**

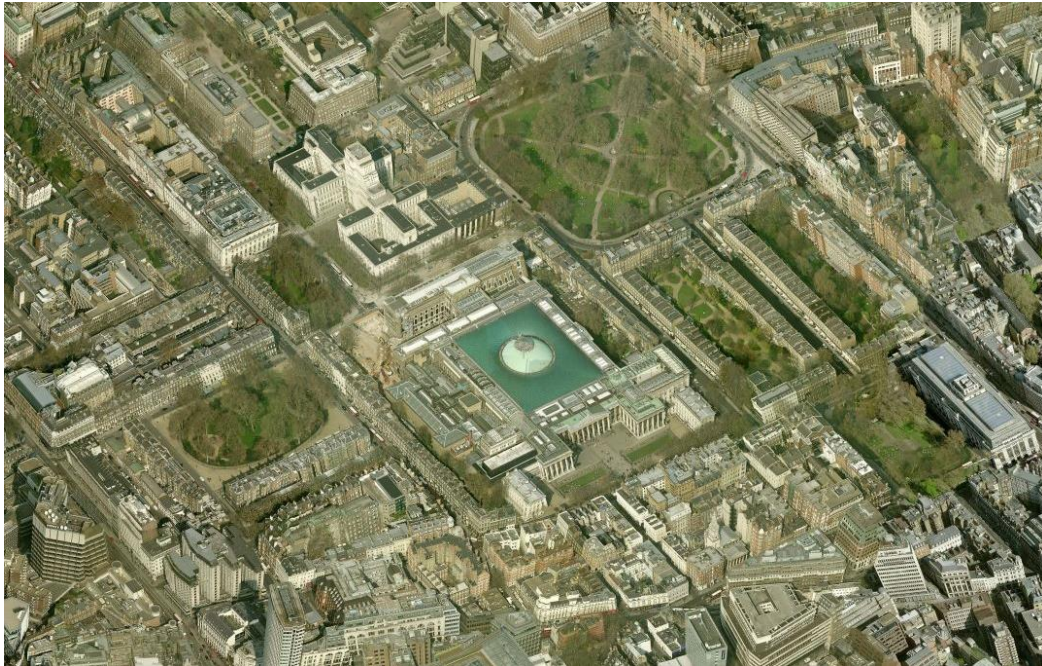
3.72 Section 3 of the Bloomsbury Conservation Area Appraisal provides a summary of the special interest of the conservation area. The area extends from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east.

3.73 The area is characterised primarily by a sequence of planned residential streets and leafy squares laid out speculatively by various developers from the 17<sup>th</sup> century onwards. The quintessential character of the conservation area derives from the grid of

<sup>46</sup> LTS, LCC: The Bomb Damage Maps 1939-45, 2016



streets enclosed by mainly three and four storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points.



**Figure 3.37: Aerial Photograph of Bloomsbury townscape (The British Museum and the core the Bloomsbury squares)**

- 3.74 There is also a distinct hierarchy of scales across the conservation area with major arterial routes having larger scale buildings, addressing broader, busier streets. This contrasts with the smaller scale, finer grained streets in other part of the conservation area where there are a larger number of narrower streets and alleyways which are intimate spaces with a particular charm and sense of history. The Appraisal document states that:

*“Overall, the area’s hierarchy of main arterial routes, grids of streets, rear mews spaces and narrow lanes creates a noticeable transition in the sense of enclosure moving around the Conservation Area. This dynamic spatial character emphasises the difference in the scale of the component streets and spaces, making each component element and the difference between them notable.” (Paragraph 3.13)*

- 3.75 A range of building types is evident across the conservation area, although the predominant type is the terraced townhouse. Shops and public houses are a feature of parts of Bloomsbury, generally forming part of or having been inserted into the earlier terraces, reflecting the growth in commercial activity in the area. Also interspersed across the area are several set piece or landmark buildings, including churches and cultural buildings. Overall it is the many later university, hospitals and other institutional buildings have introduced a larger scale to the earlier established street pattern of terraces.





**Figure 3.38: View across Bloomsbury Square (Laid out in the late 17<sup>th</sup> century but now largely rebuilt enclosing during the 19<sup>th</sup> and 20<sup>th</sup> centuries)**

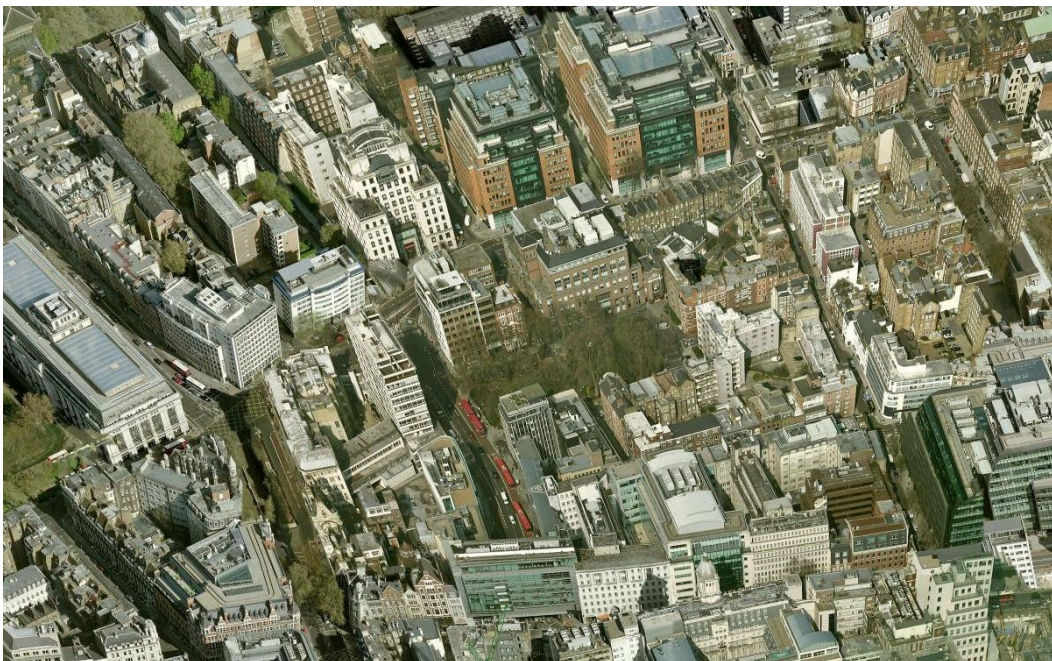


**Figure 3.39: Bedford Row (Terraced townhouses largely dating from the late 17<sup>th</sup> and early 18<sup>th</sup> century)**



- 3.76 Brick is the predominant building material within the conservation area, which is often complemented by different colours of brickwork, terracotta, stone and stucco render to dress the many mostly 18<sup>th</sup> and 19<sup>th</sup> century buildings. More modern buildings have also introduced new materials such as concrete and steel and glass to the diverse palette of materials across the area. The gradual development and redevelopment of the area over the centuries has contributed to the varied architectural styles of buildings that can now be found across the area, from the dominant Classically inspired terraced townhouses of the 18<sup>th</sup> and 19<sup>th</sup> century all the way to the Modernist buildings for the University of London.
- 3.77 The Appraisal sets out that owing to the size and complexity of the conservation area, it has been sub-divided into a series of character areas that generally share common characteristics to assist in defining those features that contribute to the area's special interest overall. These sub areas are described in section 5. The site is located within Sub Area 11 (Queens Square / Red Lion Square). The Appraisal describes that:

*“This sub-area is split into two physically separate areas as a result of the large scale 20<sup>th</sup> century interventions along Theobald’s Road, which fall outside the Conservation Area. Both areas are characterised by a focal square (Queen Square in the north and Red Lion Square in the south) which is surrounded by a network of streets and minor routes. These secondary thoroughfares are characterised by a mix of commercial or residential uses, since these areas were originally developed speculatively in the late 17<sup>th</sup> and early 18<sup>th</sup> centuries for a combination of residential and other uses.”*



**Figure 3.40: Aerial Photograph of townscape (Red Lion Square area)**

- 3.78 Red Lion Square was the first of the two squares to be constructed; it was begun in 1684 and was laid out with seven narrow passageways leading off from its corners and sides. Only Lambs Conduit Passageway remains, giving a strong sense of the intensely

enclosed nature of these former streets. the earlier townhouses having been largely redeveloped during the 19<sup>th</sup> and 20<sup>th</sup> centuries.

- 3.79 The Appraisal also describes the character and appearance of Red Lion Square as found today, stating that:

*“A variety of buildings types, styles and ages surround Red Lion Square today, including a group of early, grade II listed townhouses (Nos 14-17 (consec)) which have been refaced and a number of late 19<sup>th</sup> century red brick mansion blocks with decorative facades giving a vertical emphasis which contribute to the enclosure of the square. Conway Hall, built in 1929 to the designs of F H Mansford, in the north-east corner, is a grade II listed building of three storeys, built in grey brick with a two-storey Baroque style entrance with urns at second-floor level. Summit House is a distinctive 1920s office building by Westwood and Emberton which is also grade II listed. Built for Austin Reed, the tailors, it has a steel frame clad in a deep yellow faience which emphasises the grid-like construction.*

*The two blocks of mid 20<sup>th</sup> century flats are of an appropriate scale but employ materials and detailing which detract from the quality of the built environment. Later 20<sup>th</sup> century buildings of note include New Mercury House dating from 1978-80 by Austin Smith Lord, No 34 built by Richard and Seifert and Partners as the architect’s own office, and No 35 dating from 1955-56 by Lander, Bells and Crompton. The square was re-landscaped with two circular lawns in 1991 by Charles Funke Associates; it contains a bronze bust of the philosopher Bertrand Russell by Marcelle Quinton, dating from 1980.”*



**Figure 3.41: View across the gardens of Red Lion Square (centred on Summit House – South Side)**





**Figure 3.42: North Side of Red Lion Square (Mixed townscape character)**

- 3.80 The gradual and piecemeal development and phased redevelopment of Red Lion Square has resulted in a particularly diverse and eclectic townscape character to this urban area with no single defined architectural style or use of materials, or consistency of building scale or form. Red Lion Square is a key open space within Bloomsbury and one of the many defining historic squares of this area; however the only cohesive characteristic of its buildings is the way in which they share a strong edge and line to the central gardens and so enclose this space. It is only to the east that the historic finer grain network of secondary streets and passages of this townscape remains legible; such as parts of Princeton Street, Red Lion Street and the narrow Lamb's Conduit Passage.
- 3.81 The roovescape of this Sub-Area of this conservation area is notably varied in both form and materials; again reflecting the piecemeal development of the area and later redevelopment and alteration of buildings over a long period of time. Summit House is one of many more modern building addressing Red Lion Square that has a flat, albeit stepped, roof level dominated by the accumulation of services structures and plant. The buildings that enclose this square variety greatly in height, with the more modestly scaled and generally older properties only included within the conservation area boundary.



**Figure 3.43: View South along Red Lion Street (secondary feeder street to the East of Red Lion Square)**

### **Summary of Significance**

- 3.82 The significance of the Bloomsbury Conservation Area is as a large area comprising a series of planned elements of formal townscape as the city of London expanded northwards during the late 17<sup>th</sup> and 18<sup>th</sup> centuries, and later redevelopments of the 19<sup>th</sup> to 21<sup>st</sup> centuries.
- 3.83 It is principally characterised by a sequence of planned formerly residential streets and garden squares enclosed by terraced buildings laid out in a hierarchal fashion extending out of the main arterial routes. Bloomsbury has also continually adapted to accommodate different uses over time, and also includes a number of larger scale townscape elements primarily associated with major educational or cultural institutions such as the British Museum and University of London.
- 3.84 The conservation area has historical interest in illustrating the expansion, population growth and prosperity of this part of London from the later 17<sup>th</sup> century onwards, and also how its use and character has continued evolved up to the present day. It also has architectural interest in illustrating past approaches to planning, architectural design, style and use of materials across this period, which has resulted in a richly diverse townscape of buildings and space with a distinctive sense of place.



## 4. Application Proposals and Heritage Impact Assessment

### Introduction

- 4.1 The affected designated heritage assets of the listed building Summit House on Red Lion Square and the surrounding Bloomsbury Conservation have been identified and also their significance described as part of this report, in sections 2 and 3.
- 4.2 The relevant heritage legislative, policy and guidance is also set out in full in Appendix 3 of this report. This includes the statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990, national policy set out in the NPPF 2012 and supported by the NPPG 2014, and local policy and guidance for the historic environment.
- 4.3 Together these sections and appendices of this report provide the appropriate context for the consideration of these application proposals by the local planning authority.

### Application Proposals

- 4.4 The application proposals for this site comprise the reuse and refurbishment of the existing building as high quality office accommodation. Associated with this beneficial reuse are various works of both external and internal works of alteration and upgrade. The proposed scheme design is described in detail in the drawings package prepared by the architects BGY as part of this full application submission. This includes their supporting Design and Access Statement, a Planning Statement prepared by Savills, and also other information prepared by the wider project team with regard to building structure and condition, plant and servicing strategy etc. This information is intended to be read in conjunction, including this Heritage Statement report.
- 4.5 These proposals have been informed by the recent physical intervention of investigative works to allow for inspection and survey of the building structure, existing services and also to assess for the presence of asbestos. These works have been notified and agreed with officers at the local planning authority.

### Assessment of Heritage Impacts

- 4.6 It is assessed that these application proposals would have direct, albeit relatively minor, impact on the heritage significance of the listed building Summit House, and also that of the surrounding Bloomsbury Conservation Area. These are the heritage impacts for consideration within this report, and are also described in this section below.
- 4.7 Drawing this analysis together, the heritage impacts of the proposed scheme as a whole are then assessed in compliance with the relevant statutory duties of the Planning Act 1990, national policy within the NPPF 2012 and supporting NPPG, and the regional and local planning policy and guidance for the historic environment (Greater London and London Borough of Camden).

## **Use**

- 4.8 The driver for these application proposals is the adaptation and return of this now vacant commercial building Summit House back to use as offices, in accordance with its historic function and character as a purpose-built office, with ancillary warehousing. Upgrading the quality, functionality and servicing of the current office floorspace to meet the high standards and expectation of a new tenant in the Midtown market would then secure the viable reuse and also future conservation of this listed building. This is a “heritage benefit” that would better reveal the significance of the listed building and also its contribution to the wider conservation area and vitality of Red Lion Square.

## **Adaptations**

- 4.9 Importantly, the proposed works of both external and internal alteration to the listed building, which are described in this report, flow directly from the proposed beneficial reuse and also upgrade of this office space. These works of alteration have been fully informed by a detailed understanding and appreciation of the significance of this heritage asset and also its role within the surrounding conservation area; gained from archival research and on site analysis. This heritage assessment work has been used to ensure that further change is sensitive to the significance of the listed building, its historic fabric, form and architectural character, and also that of the conservation area, where this remains.

### ***External Refurbishment or Alterations***

- 4.10 It is the findings of assessment set out in section 3 of this report that the significance of the listed building Summit House is primarily confined to the form, appearance, materials and detailing of those largely intact elements of its original or early interwar external envelope. It is the principal interwar faience clad entrance frontage to Red Lion Square and also its corner turn and return along part of Dane Street that is of the greatest importance. The secondary status, more modest, even utilitarian and greater altered original rear elevations to Eagle Street and Yorkshire Grey Yard make a lesser relative contribution to the overall significance of the listed building. The later postwar extension of the building to Dane Street / Eagle Street and also 2000s glazed infill to the rear at Yorkshire Grey yard are elements that do not form part of its special interest.
- 4.11 Similarly, it is still largely intact elements of the original or early interwar elevations of the building to Red Lion Square, part of Dane Street and Eagle Street, and public views, which contribute to the significance, character and appearance of the surrounding conservation area.
- 4.12 Accordingly, proposals for works to the principal and public elevations of the listed building avoid alteration and instead seek to retain and reinforce its existing historic character. Change here is limited to works of required repair to the envelope in matching materials and appropriately sensitive techniques, including retention and refurbishment of existing metal window units to all elevations, retention and refurbishment of integral signage to front entrance, repairs to or replacement of pavement lights to the lightwells to Red Lion Square and also along Dane and Eagle Streets, and faience and brickwork cleaning and or repairs where required. The existing Cathode Protection system (located at basement level) for the structure will be maintained. A schedule of repair works would be prepared for this scheme. Overall these works of sensitive repair are “heritage benefits” that would better reveal the significance of the listed building and its



contribution to the conservation area, through improvement to key elements of the property.

- 4.13 As part of the proposals it has been identified that there are opportunities to improve the thermal efficiency (and also the sound insulation) of the building; albeit in a manner sensitive to the significance of this heritage asset. Accordingly a replacement / new secondary glazing system will be introduced to the entire building. The existing metal windows will be retained externally and new glazing units inserted internally. Each new frame would be manufactured to fit secured and neatly within the reveal to each different window type identified, which is fully detailed as part of the application submission drawing package for the listed building. The subdivision / opening pattern of these new secondary glazing units will also be designed specifically to respect the existing sightlines of each of the retained windows; principally as appreciated in external views. This change would be designed to be a fully reversible installation. Overall this would not harm the significance of the listed building or its contribution to the surrounding conservation area.
- 4.14 A further minor change would be the installation of decking to the flat roof area at the rear of the building (Eagle Street) at fourth floor level for use as a terrace for office users. This would be a reversible installation and also would only require the modest raising of the height of the existing safety metal balustrading, to similar design and materials, with little effect on views from the street below. Access to the terrace would be improved by the simple adaptation of two existing window openings to form doors (and one existing doorway would be partially infilled in matching brickwork below what would become a new window). This change would affect part of the upper west elevation of the later post war extension to the building, would have little visual affect within the local area and would not affect the special interest of the listed building.
- 4.15 As part of the overall upgrade of the quality of existing office space the existing servicing would be replaced and improved in terms of energy efficiency; as described in supporting information by others to the application submission. This would require replacement of existing outdated plant currently positioned at roof level within existing service structures / enclosures or otherwise grouped and open to the elements on flat roof areas. The existing modern render plant room would be removed as part of this scheme as well as the modern roof covering being upgraded as required. As found today, the roof level of the listed building comprises a series of changing levels, largely flat and asphalted, and dominated by this successive build-up of modern utilitarian service structures and plant equipment. Overall these modern functional elements at roof level do not contribute to the significance of the listed building.
- 4.16 New and replacement plant equipment would be housed either within existing roof level structures, screened by newly installed enclosures or open to the elements as existing. The existing modern rendered plant room in the depth of the plan would also be removed as part of rationalisation and overall visual improvement of the existing roof condition. The amount of plant required and positioned at this level to service the upgraded office use has been minimised and limited in size where possible, and also positioned discreetly within the depth of the plan of the building alongside existing taller roof elements. Opportunities for the installation of other required plant within basement areas has also be maximised as part of this scheme. New screening to the chiller will

serve both as an acoustic barrier and will also beneficially minimise the effect on private views of this equipment from taller surrounding buildings.

- 4.17 Importantly, new and replacement roof level plant has been positioned and also designed to ensure that any visual impact on public views from surrounding streets within this part of the conservation area has been avoided. The relatively tight street pattern and density of built development to the south of Red Lion Square severely restricts the number and extent of public views of the roof level of the listed building. In longer views towards the property from north and across the square the number of mature trees within the garden constrains the appreciation of the roof level to some degree, and also the taller parapet level to this principal elevation currently screens existing roof top elements. Proposed change at roof level would not undermine the existing appreciation of the defined parapet and roof line of the listed building within key street level views from the north and across the square. Overall the significance of the listed building and conservation area would not be harmed relative to the existing condition at roof level.
- 4.18 Within the highly confined external space of Yorkshire Grey Yard within the site the required refuse enclosures and also bicycle storage racks for the office use would be installed. This would not affect the special interest or significance of the listed building or conservation area, and accords with the existing function of this space.
- 4.19 Also as part of this scheme it is proposed to replace existing modern CCTV and other security and lighting equipment to the exterior of the building with new. The approach has been to minimise the number of such installations required to maintain the security and safety of the building in use, and also to consider the existing and new locations, size and colour of new equipment, and their fixings carefully. This is all to ensure that they are as visually discrete as possible and have little or no impact on existing fabric or key external features of the original building. Overall this change would not harm the special interest of the listed building or its contribution to the surrounding conservation area as experienced in local views.

#### ***Internal Alterations***

- 4.20 It is also the findings of assessment set out in section 3 of this report that the internal elements and spaces of the listed building Summit House make a much lesser contribution to its overall significance relative to the external envelope. This is largely due to the substantial degree of later alteration and past loss or compromising of original features, as well as the fact that this interwar building type would generally only have been decorated to a high quality to the higher status main entrance and boardroom areas and other areas left more standardised even utilitarian. As found today, only the now rather isolated original elements of plan form, materials and or decorative details of the main entrance lobby and fragmentary part of the linked central hall / corridor at ground floor level (itself largely “restored” in the 2000s), and the main open staircase structure and form of its enclosure from basement up to fourth floor level, are of special interest. The remainder of the internal areas of the listed building are not of special interest.
- 4.21 Accordingly, proposed works of internal alteration and refurbishment are largely confined to the elements and areas of the listed building that have been identified to be



of no special interest. The mostly intact octagonal main entrance lobby, and its decorative features, would be retained as existing and in use as the principal access to these offices. The existing part original and part replaced front doors would also be retained. The original concrete structure of the main open well staircase within the centre of the site will be retained, as would the secondary service stair within the former rear warehousing element of the building. Connecting the main entrance lobby and the central staircase, the existing largely recreated corridor and stair lobby at ground floor level will also be retained, including the appropriate decorative treatment of its ceiling, walls and flooring. This sensitive approach ensure that not only surviving historic interior elements but also more modern features of “restoration” within the listed building will be retained and reused as part of the new scheme.

- 4.22 Proposed change within the main entrance and circulation areas at ground floor level are limited to the removal or replacement of existing modern glazed or solid office doors of no special interest. The adjoining more open and modern reception area at this level would be reconfigured as part of improvements to office accommodation. Such change would not affect historic fabric or features of importance, of indeed the special interest of the listed building as a whole.
- 4.23 Adaptations are proposed to the main central staircase as part of the upgrade works. The existing modern replacement balustrade will be very modestly raised to a matching design and materials at basement and each upper landing area in order to improve safety and functionality. This also responds to changing office floor levels, as a result of existing modern build-up, and would also accord with current building regulations for office use. An additional step will be introduced at each stair landing again at basement and then from first floor level upwards to address this change in level between this circulation area and the replacement floor build-up. Overall this is a discreet intervention that would be designed to be reversible with no impact on the original stair form or structure. This well considered change would not harm the significance of the listed building.
- 4.24 The existing secondary and more utilitarian staircase within the rear former warehouse element of the building would also be retained in use. Adaptation here is limited to the intervention of a new partition at ground floor level to comply with current fire regulations, and also again modestly raising the handrail and introducing an additional step to accord with new floor levels across the building. These changes could be reversible would have no harmful impact on the significance of the listed building.
- 4.25 Elsewhere within the building core modern facilities and services, including WCs, kitchens, lift equipment etc., will be reconfigured and replaced with new, and also the partitioning of largely modern office spaces across all floor levels reconfigured to a new layout for the requirements of the new tenant or tenants within the existing structural grid of the building. Existing service voids to raised floors and suspended ceiling would be removed, replaced and or reutilised to accommodate the required M&E upgrade for the office use. Existing risers would be reused and also new introduced as part of these improvements as required. Overall such change to these modern office spaces would not affect historic fabric or features of importance and not harm the special interest of the listed building.

- 4.26 Structural alterations are also proposed as part of the new scheme. Principally these interventions seek to remove the larger part of “spine walls” positioned towards the Dane Street and also Eagle Street elevations of the building. The position of these walls relate to those that once divided the interwar office and former warehouse elements of the complex and neighbouring properties at the corner of these two streets – all now internalised and the legibility of this past layout lost as a result of later postwar extension. The redevelopment of this part of the site and extension of office space in the 1970s was achieved by breaking out beyond these walls to create additional floorspace within a new build element on the shared corner site. Only remnant elements of these former partition walls remain internally and a series of later openings currently allow connections across the entire office floor plate. These elements do not represent historic fabric or features of importance and do not contribute to the special interest of the listed building.
- 4.27 These alterations are required to improve the openness and flexibility of the office accommodation, and therefore the appeal of these floor plates to new tenants. The proposed removal of wall elements and the intervention of new steel frames in these positions will retain the integrity and stability of the building, and also still allow the past location of divisions between the earlier and later parts of the building to be read internally. Further information on the structural implications of these works to the building have been provided by others as part of the application submission. Overall these changes would not affect the special interest of the listed building, and also not undermine the appreciation or understanding of its significance as found today.

## **Compliance with Heritage Legislation and Policy**

### ***Statutory Duties***

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

- 4.28 The Planning Act 1990 requires special regard to be paid to the desirability of preserving the special interest of listed buildings and their settings, and also for special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area, in determining applications. The meaning of preservation in this context, as informed by case law, is taken to be the avoidance of harm.
- 4.29 It is demonstrated in this report that the proposals have given considerable weight and importance to these statutory duties, as required, through proportionate assessment of the significance of the listed building and surrounding conservation area and also the appropriately sensitive consideration of the scheme design. Overall these proposals will preserve the special interest of the listed building, and will also preserve the character and appearance of the conservation area. Harm would be avoided.

### ***National Policy and Guidance***

#### ***NPPF and NPPG***

- 4.30 In accordance with the requirements of paragraph 128 of the NPPF 2012 the significance of the identified affected designated heritage assets of the listed building and conservation area have been described in a proportionate manner in this report - as fully informed by archival research and on-site analysis.



- 4.31 It is demonstrated in this report that these proposals are in accordance with overarching paragraph 131 of the NPPF. This encourages local planning authorities to take account of the desirability of sustaining and enhancing the significance of all heritage assets, including this listed building and its contribution to the conservation area, and putting them to viable uses consistent with their conservation, i.e. reuse as an office as originally designed in this case; the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality, i.e. the vibrancy and vitality of Red Lion Square in this case; and also the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.32 Paragraph 132 requires that great weight should be given to conservation of designated heritage assets, such as listed buildings and conservation areas. Importantly, Annex 2 of the NPPF defines “conservation” as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. It is not a process that should prevent change or arrest new development where proposals such as this scheme would overall conserve both the identified designated heritage assets, sustain their significance, and not result in harm.
- 4.33 This paragraph also sets out that any harm to, or loss, of significance of a designated heritage asset would require clear and convincing justification. It is the findings of heritage impact assessment that the proposed scheme would not result in harm to the significance of the listed building or the conservation area. Therefore the provisions set out in paragraph 13 and 134 of the NPPF would not apply in this case.
- 4.34 The proposals are also in accordance with paragraph 137, which states that local planning authorities should look for opportunities for new development within conservation areas or the setting of listed buildings that will enhance or better reveal their significance, i.e. deliver “heritage benefits”. The heritage benefits that would be delivered by these proposals include:
- Return of the currently vacant listed building to use as an office in accordance with its past use, and in the interests of securing its future conservation and also its contribution to the vitality of the conservation area; and
  - Works of repair and refurbishment of exterior of the listed building where required.

### ***Local Policy and Guidance***

#### ***London Plan 2015***

- 4.35 This report appropriately identifies the designated heritage assets of the listed building and conservation area that will be affected by these proposals, and describes overall how they would be valued, conserved, re-used and or incorporated where appropriate. This is in accordance with Policy 7.8 of the further alterations to the London Plan 2015.

#### ***Camden Core Strategy 2010***

- 4.36 It is demonstrated in this report that these proposals are in accordance with the aims of Policy CS14 with regard to promoting high quality design that respects the local context and character, including heritage assets across the Borough.

***Development Policies 2010***

- 4.37 As part of the design development of this scheme due regard has been given to relevant policy criteria set out in Policy DP24. The proposed approach is described in further detail in this section above, and also in the complementary Design and Access Statement prepared by the architects.
- 4.38 In accordance with Policy DP25, these proposals seek to preserve and enhance the character and appearance of the surrounding conservation area, and also avoid harm to the special interest of the listed building.
- 4.39 Due consideration has also been given to relevant supplementary planning guidance, with regard to design and heritage, set out in Camden Planning Guidance 1 and also the Bloomsbury Conservation Area Appraisal and Management Strategy document.

## 5. Summary and Conclusions

- 5.1 In summary, the designated heritage assets of the listed building Summit House and the surrounding Bloomsbury Conservation Area have been identified and the significance of each described in a proportionate manner as part of this report - in sections 2 and 3. Accordingly these application proposals have been fully informed by a clear understanding and appreciation of the heritage significance of these heritage assets and their relative sensitivity to change.
- 5.2 Section 4 sets out a description of these proposals and their impact on the significance of these heritage assets through change to fabric, features and appearance. This is then assessed fully in light of the relevant statutory duties, national, regional and local planning policy and guidance for the historic environment.
- 5.3 It is the conclusion of this heritage impact assessment that overall these proposals would preserve the special interest of the listed building, and would also preserve the character and appearance of the surrounding conservation area. These designated heritage assets would be conserved, and their significance sustained and or enhanced.
- 5.4 This is in accordance with the principles set out in the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF 2012 (paragraphs 128, 131, 132, 137) and supported by NPPG, and other relevant local policy and guidance (including FALP 2015: policy 7.8, Camden Core Strategy 2010: policy CS14, Development Policies DPD 2010: policies DP24, DP25, and CPG1).



## Appendix 1: **Designated Heritage Assets**

**List Entry – Summit House and Attached Railings and Wall, Red Lion Square (Listed Building Grade II GV)**

**Boundary Map - Bloomsbury Conservation Area**

## **SUMMIT HOUSE AND ATTACHED RAILINGS AND WALL**

### **List Entry Summary**

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: SUMMIT HOUSE AND ATTACHED RAILINGS AND WALL

List entry Number: 1245493

### **Location**

SUMMIT HOUSE AND ATTACHED RAILINGS AND WALL, RED LION SQUARE

The building may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 06-Jul-1981

Date of most recent amendment: Not applicable to this List entry.

### **Legacy System Information**

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 477834

### **Asset Groupings**

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

### **List entry Description**

### **Summary of Building**

Legacy Record - This information may be included in the List Entry Details.

### **Reasons for Designation**

Legacy Record - This information may be included in the List Entry Details.

### **History**

Legacy Record - This information may be included in the List Entry Details.

### **Details**

CAMDEN

TQ3081NE RED LION SQUARE 798-1/101/1372 (South side) 06/07/81 Summit House and attached railings and wall

GV II

Office block. 1925. By Westwood and Emberton. For Austin Reed. Steel frame faced with deep yellow faience emphasising the grid-like construction. 6 storeys with 3 storey stair bay to left. 8 window bays plus stair bay. Return to Dane Street of 4 storeys 10 windows. Bays articulated by plain faience cladding strips rising to a plain blocking course. Recessed entrance with wood doors incorporating 2 carved panels from the original doors, which illustrated Austin Reed products - ties, collars, socks, waistcoats etc, by Percy Metcalfe. One incorporates the letter box with carved envelopes, the word "letters" and a lion, the other a date panel carved with a lion. Metal-framed windows with spandrel panels having geometric faience relief decoration. The 3-storey bay with slightly protruding black painted metal bay rising through the storeys with narrow vertically set windows. INTERIOR not inspected. SUBSIDIARY FEATURES: attached decorative iron railing of curved spikes on a stone wall surrounding the area.

Listing NGR: TQ3061681665

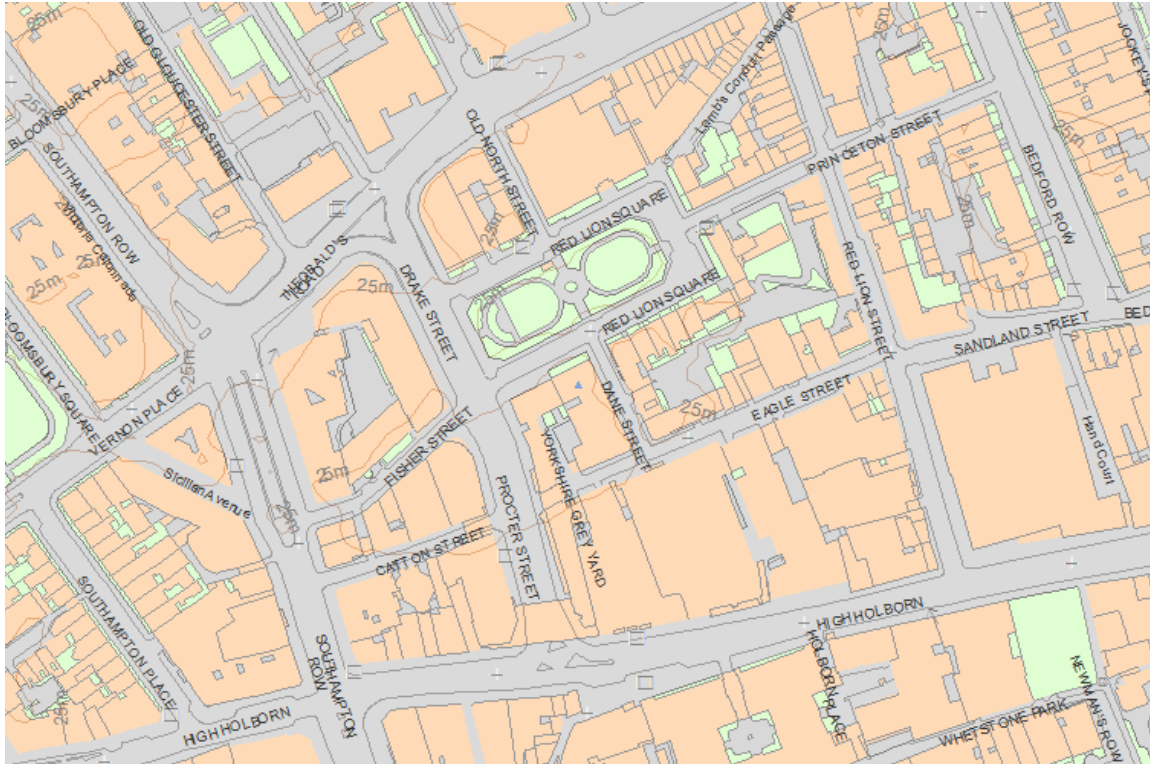
### **Selected Sources**

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: TQ 30616 81665

### **Map**

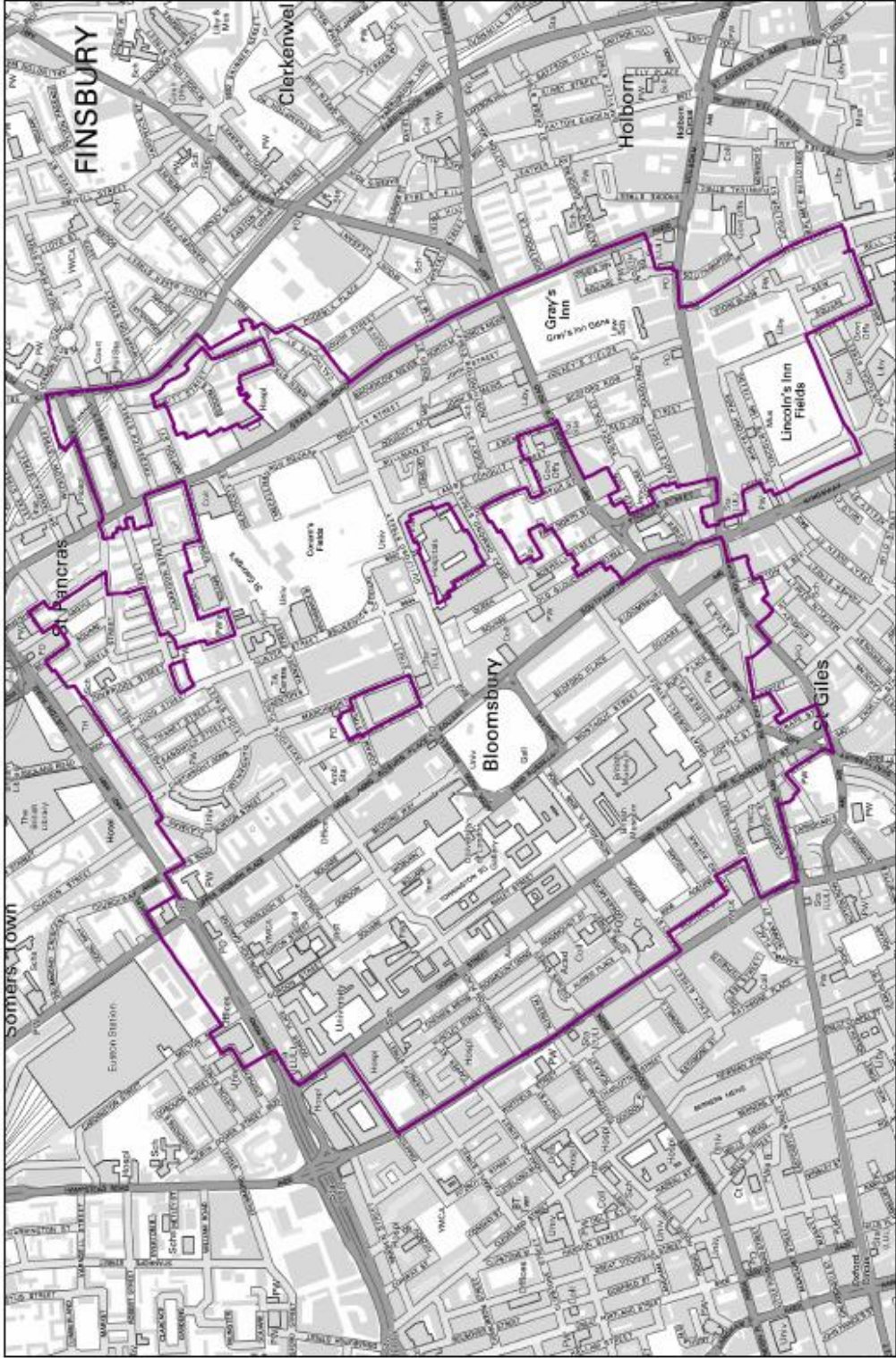




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Camden  
Map Ref No: 03002

Print Date: 10/26/2019  
Printed By: L.Smith

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Scale 1: Not Usable Scale

Map for Internal Use Only



### Bloomsbury CA

Appendix 2: **Extract - The British Builder,  
June, 1925, pp180-182 (Royal  
Institute of British Architects:  
Architecture Library)**



## Appendix 3: **Heritage Legislation, Policy and Guidance**

## Statutory Duties

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

1. The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for;  
  
*“(s.7) ... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest ...”*
2. In determining such applications the following duty is placed upon the decision maker:  
  
*“s.16(2) In considering whether to grant listed building consent for any works 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.”*
3. With regard to applications for planning permission within conservation areas, it is set out that:  
  
*“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*
4. Importantly, the meaning of preservation in this context, as informed by case law, is taken to be the avoidance of harm.

## National Policy

### National Planning Policy Framework (NPPF) 2012

5. The National Planning Policy Framework (NPPF) was introduced in 2012 as the full statement of Government planning policies covering all aspects of the planning process. One of the twelve core planning principles of the NPPF 2012 is that planning should:
  - *“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.”*
6. The glossary of the NPPF (Annex 2) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
7. Chapter 12 of the NPPF outlines the Government's guidance regarding conserving and enhancing the historic environment in more detail.
8. Paragraph 128 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the

assets and sufficient to understand the potential impact of the proposals on their significance.

9. Paragraph 129 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
10. Paragraph 131 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into 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.
11. Paragraph 132 further outlines that local planning authorities should give great weight to the asset's conservation when considering the impact on a proposed development on the significance of a designated heritage asset, such as the listed building and conservation area. The more important the heritage asset, the greater the weight should be.
12. It is also specified that any harm to, or loss, of significance of a designated heritage asset should require clear and convincing justification. Paragraph 133 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied.
13. Paragraph 134 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.
14. Paragraph 137 encourages local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets, such as listed buildings, to enhance or better reveal their significance. It also states that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.

## **National Guidance**

### **National Planning Practice Guidance (NPPG) 2014**

15. National Planning Practice Guidance 2014 has been issued by the Government as a web resource, including a category on conserving and enhancing the historic environment. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF 2012.
16. NPPG helps to define some of these key heritage terms used in the NPPF. With regard to substantial harm, it is outlined that in general terms this is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building

constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest. Optimum viable use is defined in the NPPG as the viable use likely to cause the least harm to the significance of the heritage asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. Public benefits are also defined in the NPPG as anything that delivers economic, social and environmental progress as described in the NPPF. Public benefits should flow from the proposed development, and they may include heritage benefits.

### **Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2010**

17. The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paras. 9 and 10, as below:

*“Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;*

*Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.*

*10. When making a listing decision, the Secretary of State may take into account the extent to which the exterior contributes to the architectural or historic interest of any group of buildings of which it forms part. This is generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between a group of buildings. If a building is designated because of its group value, protection applies to the whole of the property, not just the exterior.”*

18. In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been first published by English Heritage (now Historic England) from 2011. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type. The relevant Listing Selection Guide for this property is Domestic 2: Town Houses.

### **National Advice**

#### **Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment 2015**

19. GPA Note 2 provides information to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the



National Planning Practice Guidance (NPPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

- 1. Understand the significance of the affected assets;*
- 2. Understand the impact of the proposal on that significance;*
- 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;*
- 4. Look for opportunities to better reveal or enhance significance;*
- 5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;*
- 6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.*

### **Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, 2015**

GPA Note 3 provides information to assist in implementing historic environment policy with regard to the managing change within the setting of heritage assets. This also provides a toolkit for assessing the implications of development proposals affecting setting. A series of stages are recommended for assessment, these are:

- Step 1: identifying the heritage assets affected and their settings*
- Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)*
- Step 3: assessing the effect of the proposed development*
- Step 4: maximising enhancement and minimising harm*
- Step 5: making and documenting the decision and monitoring outcomes.*

### **Historic England: Advice Note 1: Conservation Area Designation, Appraisal and Management 2016**

20. This advice document sets out a series of conservation principles and guidance regarding the management of conservation areas. It outlines the fundamentals of designation, and, importantly, puts in place processes for character appraisals which may be used to manage development in the area moving forward. It sets an over-arching objective for character appraisals as documents which understand and articulate why the area is special and what elements within the area contribute to this

special quality and which don't. Having done this, it outlines an approach to assessments of special interest which uses desk and field-based inquiry.

### **Historic England: Advice Note 2: Making Changes to Heritage Assets 2016**

21. This document provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone, based on the following types of heritage asset: buildings and other structures; standing remains including earthworks; buried remains and marine sites; and larger heritage assets including conservation areas, landscapes, including parks and gardens, and World Heritage Sites. It is intended to be useful to owners, developers, local planning authorities and others in considering works to all heritage assets.

### **Local Policy and Guidance**

22. There is no statutory requirement to have regard to the provisions of the development plan in the consideration of applications for listed building consent. However, it is likely that the objectives of national policy and the development plan, with regard to the protection of heritage assets, will be closely aligned. Local authorities should also ensure that aspects of conservation policy that are relevant to development control decisions are included in the development plan.
23. The development plan for the London Borough of Camden comprises the London Plan 2011 (and revisions up to 2015), Camden's Core Strategy DPD 2010, Development Policies DPD 2010, and supplementary planning documents. These documents provide local guidance with regard to development affecting heritage assets, and should accord with the statutory duties and the general principles outlined in the NPPF 2012.

### **London Plan (FALP) 2015**

24. On 10 March 2015 the Mayor 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.
25. Policy 7.8 (Heritage Assets and Archaeology) which states that:

#### *"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.*

*E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset ...”*

### **Camden Core Strategy DPD 2010**

26. The Camden Council Core Strategy was adopted on 8 November 2010. It sets out the key elements of the Council's planning vision and strategy for the Borough.
27. Core Strategy policy CS14 regards the conservation of Camden's heritage. It outlines the objective of preserving and enhancing Camden's rich and diverse heritage assets and their settings.

### **Camden Development Policies DPD 2010**

28. The Camden Council Development Policies DPD was also adopted on 8 November 2010. It contributes towards delivering the Core Strategy by setting out detailed planning policies that the Council will use when determining applications for planning permission in the borough to achieve the vision and objectives of the Core Strategy.
29. Policy DP25 from the Development Policies DPD regards conserving Camden's heritage. It states that in order to maintain the character of Camden's conservation areas, the council will:

*“A) Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;*

*B) Only permit development within conservation areas that preserve and enhances the character and appearance of the conservation area;*

*C) Prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;*

*D) Not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and*

*E) Preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage."*

30. The policy also states that 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 listed building;*

*G) Not permit development that it considers would cause harm to the setting of a listed building."*

### **Supplementary Planning Documents / Guidance**

#### ***Camden Planning Guidance SPD 2011***

31. Camden's Planning Guidance provides further information on the application and implementation of policies contained within the Development Plan. The guidance contained within this document are broadly compliant with the relevant local policy framework and best practice outlined in this appendix and as such is noted here for the sake of completeness only.

#### ***Bloomsbury Conservation Area Appraisal and Management Strategy SPD 2011***

32. The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted as supplementary planning guidance on 18 April 2011. This appraisal has been prepared to define the special interest of the conservation area in order that its key attributes are understood and can be protected, and that measures are put in place to ensure appropriate enhancement. It replaces a Conservation Area Statement adopted in 1998.



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