

Heritage Impact Assessment

Summit House, Red Lion Square, Bloomsbury,
London Borough of Camden

November 2018

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Client
The Office Group

Date
November 2018

1. Introduction

Purpose of this Report

- 1.1 This Heritage Impact Assessment report has been prepared by Turley Heritage on behalf of our clients (The Office Group) to provide relevant and proportionate information to the local planning authority with regard to the heritage impacts related to, and also in support of, applications for planning permission and listed building consent for works of internal and external alteration to the grade II listed building Summit House, which also lies within the Bloomsbury Conservation Area.
- 1.2 This application will be submitted by DP9 as planning agent and these works are described as:

“External alterations to create 2no. lightwells, installation of 5no. condenser units at roof level, rearrangement of cycle parking and new amenity space. Internal alterations to create new stairwell, revised office floor plans and minor changes to fixtures and fittings.”
- 1.3 As background, this application follows the implementation of a previous and more comprehensive scheme for development and refurbishment of the building in office use. This previously approved applications for listed building consent and planning permission from 2017 (LPA reference: 2017/0814/L and 2017/0077/P) were described as:

“Internal refurbishment of existing Class B1 office building (Grade II listed) including alterations to floorplate layouts, new flooring, provision of secondary window glazing, replacement of services and ancillary facilities, enhancement of entrance lobby and waterproofing of basement areas; replacement of existing pavement lights; replacement of plant equipment at roof level; and provision of cycle racks within existing service yard.”
- 1.4 More recent applications in 2018 for the installation of low level ducting and associated structures to serve existing roof level plant, including screening and replacement of external lighting on Dane Street elevation (LPA reference: 2018/2511/L and 018/1565/P) have also been approved.
- 1.5 Turley Heritage prepared a supporting and full Heritage Statement report in January 2017 in relation to this previous and now approved scheme on site. This is appended in full to this new report at **Appendix 1**, for ease of reference and as relevant again to the new works.
- 1.6 The requirement for this new Heritage Impact Assessment report stems from Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that places a duty upon the local planning authority in determining applications for development affecting listed buildings to pay special regard to the desirability of preserving the building or its setting. And also to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

- 1.7 The National Planning Policy Framework (NPPF) 2018 provides the Government’s national planning policy for the conservation of the historic environment. In respect of information requirements it sets out 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.”¹

- 1.8 Paragraph 190 then sets out that local planning authorities should identify and assess the particular significance of heritage assets that may be affected by proposals, including by development affecting the setting of a heritage asset. 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.

Structure of this Report

- 1.9 In accordance with the above legislative and policy requirements, the heritage assets on Site that would be affected by the scheme proposals have already been identified by Turley Heritage. The heritage significance of these heritage assets is also described – for the listed building (Summit House) in terms of special architectural and historic interest, and the surrounding Bloomsbury Conservation Area in terms of historical development, and character and appearance.
- 1.10 This heritage baseline assessment work is set out fully in our previous Heritage Statement, which is appended at **Appendix 1**. This assessment work was undertaken on the basis of extensive review of published information, detailed archival research and on-site visual survey. It is proportionate to both the importance of each of the heritage assets and the nature and extent of the impacts of the proposals on their significance.
- 1.11 For ease of reference the affected heritage assets relevant to this new scheme are identified again in **Section 2** of this report, and then their significance summarised.
- 1.12 **Section 3** undertakes a review of the new scheme proposals and assesses the impact of these on the significance of the identified designated heritage assets of the listed building and conservation area. These impacts are also reviewed in light of the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy in the NPPF 2018 and supported by NPPG, and most up to date regional and local planning policy for the historic environment – which is set out in detail at **Appendix 2** as a required update to legislative and policy context in the previous Heritage Statement.
- 1.13 **Section 4** provides the summary and conclusions of this report.

¹ MHCLG, National Planning Policy Framework (NPPF) 2018 – para.189

2. Heritage Assets and Significance

Heritage Assets

2.1 The National Planning Policy Framework (NPPF) 2012 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.”²

2.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation under relevant legislation and are then subject to particular procedures in planning decisions that involve them. The NPPF³ also identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (including local listing).

2.3 The designated heritage assets of Summit House and the Bloomsbury conservation area are identified, the significance of which would be affected directly by these new works of alteration.

2.4 Summit House, Red Lion Square (specifically also including attached railings and wall to the square) was first included on the statutory list of buildings of special architectural or historic interest at grade II and for group value on 6 July 1981.

2.5 The site is located within the Bloomsbury Conservation Area, which was first designated in 1968 by the London Borough of Camden. The conservation area boundary runs along the western boundary of the site to exclude much of the west and also north sides of Red Lion Square from this designation.

Heritage Significance

2.6 The NPPF defines the significance of a heritage asset as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”⁴

2.7 Statements of significance for the listed building at Summit House and also the wider Bloomsbury Conservation Area were first prepared in January 2017 and subsequently submitted to the local planning authority as part of the now approved scheme application. This heritage baseline assessment work is set out in the 2017 Heritage Statement as appended, and summary statements from the previous report are also included below for ease of reference.

² MHCLG, National Planning Policy Framework (NPPF) 2018 - Annex 2: Glossary

³ MHCLG, National Planning Policy Framework (NPPF) 2018 - Annex 2: Glossary

⁴ MCHLG, National Planning Policy Framework (NPPF) 2018 – Annex 2: Glossary

Listed Building

Summary of Significance – Summit House

2.8 The significance of this listed building Summit House can be summarised as below:

Architectural Interest

- High quality and high profile example of a purpose-built office building dating from the interwar period (originally with ancillary warehousing), which is expressed principally through its exterior architecture of bold and cubic massing, colourful faience cladding, and its distinctive and then highly fashionable Moderne or Art-Deco style and decorative detailing;
- Its structural steel framing also displays some advancement in its construction materials and techniques for this building type and period in London;
- Direct association with nationally important architect and designer Joseph Emberton (and Percy James Westwood), as well as noted sculptor Percy Metcalfe for the original decorative timber entrance doors

Historic Interest

- Illustrating the development of then popular styles, use of materials and construction methods for interwar commercial architecture in London;
- Direct association with past important national fashion retail company Austin Reed – commissioned by them as their head office (with ancillary warehousing);
- More broadly recording the intensity of redevelopment and commercialisation on this part of Bloomsbury in the interwar period;

Group Value

- Townscape role marking the corner with Dane Street and also in defining and part enclosing the key urban space of Red Lion Square with other buildings of a mix of ages, scales and architectural styles.

2.9 In overview, the significance of 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.

2.10 It is the principal interwar faience clad entrance frontage to Red Lion Square and also its corner turn and return along Dane Street that is of the greatest importance architecturally and historically. The secondary status, more modest even utilitarian and more 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.

2.11 Overall the internal elements and spaces of the listed building make a much lesser contribution to its 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 relative to the higher status afforded to the main entrance and boardroom areas, with other (lower-status) areas left more standardised, even utilitarian. Limited elements of special interest remain on the Site: only the (now rather isolated) original elements of plan form, materials and decorative details survive in the main entrance lobby, and fragmentary parts of the linked central hall / corridor at ground floor level, and main open staircase structure and form of its enclosure from basement to fourth floor level are of special interest; albeit part “restored” in the 2000s. The remainder of the internal areas are not of special interest.

Conservation Area

Summary of Significance – Bloomsbury

- 2.12 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-17th and 18th centuries, and later redevelopments of the 19th to 21st centuries.
- 2.13 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.
- 2.14 The conservation area has historical interest in illustrating the expansion, population growth and prosperity of this part of London from the later-17th 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.
- 2.15 The Site (Summit House) contributes positively to the character and appearance of the conservation area, as a listed building which is prominent in the local townscape. Due to its scale and massing, Summit House defines the corner with Dane Street, and its materiality and design allows it to contribute positively to the boundary and setting of Red Lion Square, along with a diverse range of other buildings.

3. Application Proposals and Heritage Impact Assessment

Scheme Proposals

- 3.1 This section undertakes a review of the new scheme proposals now at application for:

“External alterations to create 2no. lightwells, installation of 5no. condenser units at roof level, rearrangement of cycle parking and new amenity space. Internal alterations to create new stairwell, revised office floor plans and minor changes to fixtures and fittings.”

- 3.2 The scheme proposal follows a sequence of previously approved and more comprehensive schemes, as a further revision to the building and use agreed in the planning permission and listed building consent granted in 2017 / 2018.
- 3.3 This section assesses the impact of these works on the significance of the identified designated heritage assets of the listed building and surrounding conservation area. These impacts are also reviewed overall in light of the relevant statutory duties and current regional and local planning policy for change within the historic environment.
- 3.4 Full details with regard to the design of the scheme proposals are set out in the drawings package and images, including the Design and Access Statement, prepared by The Office Group as part of this application submission. This Heritage Statement should be read in conjunction with this complementary design and planning material. Reference should also be had to the cover letter provided by DP9 setting out the content of, and rationale behind, this new application

Assessment of Heritage Impacts

Heritage Significance and Sensitivity

- 3.5 The Site has mixed levels of heritage significance and sensitivity, related to the degree of alteration it has undergone in different areas. The building is of high significance as a purpose-built interwar office building, recording the style and materiality of the period. The Site’s Moderne/Art-Deco style and detailing contributes to its interwar character, in addition to recording the commissioning role of first occupants Austin Reed. This significance is invested almost exclusively in the façade to Red Lion Square, and towards the entrance hall, as set out in the Heritage Statement at **Appendix 1**.
- 3.6 The contribution of nationally important architect and designer Joseph Emberton (and Percy James Westwood), and sculptor Percy Metcalfe also contributes to the character of the Site, as well as its aesthetic form, and where these contributions remain legible they are of high significance and high sensitivity. However, where the greater part of the building has been altered partly externally, and mostly internally, there is far greater capacity to accommodate change whilst sustaining the heritage significance of the Site.

3.7 The Site is prominent in marking the corner with Dane Street and also in defining the key urban space of Red Lion Square, alongside with other buildings of a variety of ages, scales and architectural styles. The Site contributes positively to the Bloomsbury conservation area in this regard.

Proposed Change

Lower Ground Floor Level

3.8 Figure 3.1 sets out the four areas of proposed demolition at lower ground floor level. Label A identifies an area of works to create an external lightwell from a currently internal space, shown in Figure 3.2, achieving the enhancement of reinstating a sense of openness to the historic light well at the north eastern corner of the building. This will be achieved by removing the concrete 'lid', perforated by glass blocks, at ground floor level to the north eastern corner. The existing faïence façade, which extends to the lower ground floor level, will be re-exposed and become visible from street level, creating visual continuity with the main façade, and offering a heritage benefit to both the listed building and the surrounding conservation area.

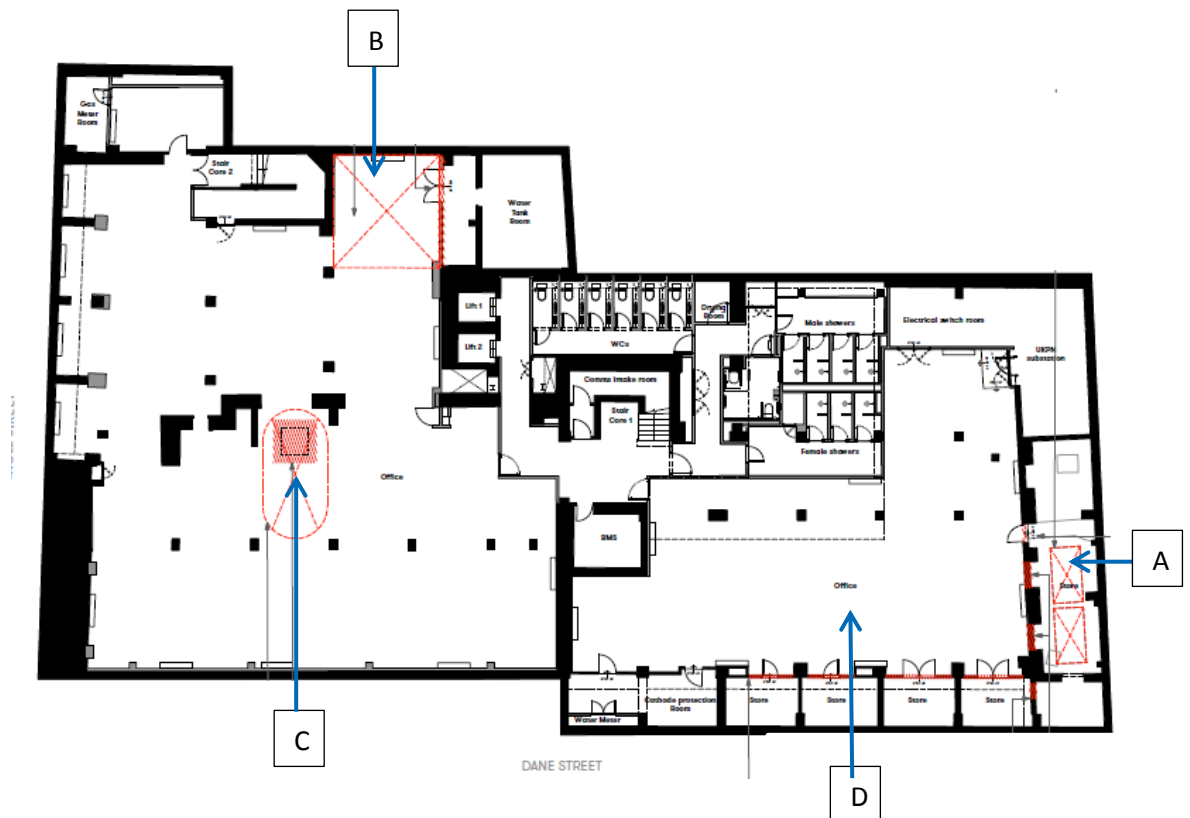


Figure 3.1: Lower ground floor demolition plan.

3.9 As part of the reinstatement of the lightwell, windows are to be reintroduced to two existing, closed-up window openings between the lightwell and the lower ground floor, allowing natural light into the office area, shown in Figure 3.2. The windows will be fitted with painted black metal frames in keeping with existing window frames elsewhere in the building, and will restore the historic pattern of fenestration to the Red Lion Square elevation, offering the enhancement of improving the legibility of the Site's historic design.

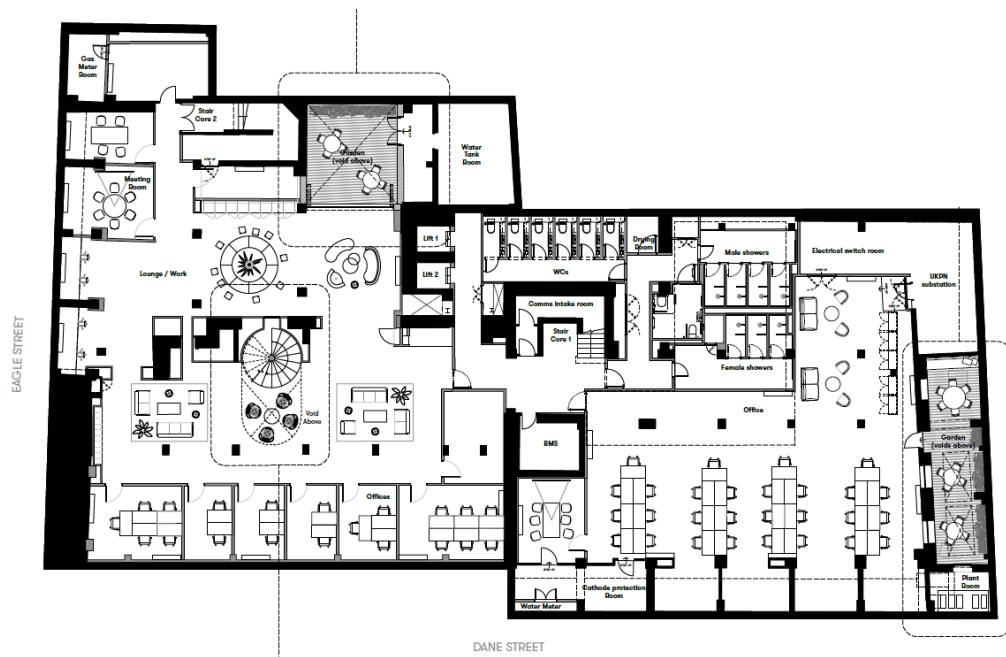


Figure 3.2: Proposed lower ground floor arrangement.

- 3.10 It is also proposed to upgrade the (currently internal) door between the currently enclosed lightwell and the office, with an external door in an appropriate black metal-framed and glazed design, matching existing external doors. Following the removal of the lid, the lightwell will be restored to use as an external space, in keeping with the earliest 1925 designs for the building and enhancing the legibility of the Site.
- 3.11 In the western courtyard, in the area marked B on Figure 3.1, it is proposed to create a new lightwell and garden at lower ground floor level, as depicted in Figure 3.2. This will increase natural light levels to the lower ground floor. At ground floor level, a new balustrade will be installed to the perimeter of the lightwell, in keeping with the metalwork extant within the courtyard. The proposed lightwell is in a much-altered part of the Site, which has a very low degree of heritage interest and a high capacity to accommodate change. Therefore, the proposed lightwell to the western courtyard would sustain the heritage significance of the Site.
- 3.12 It is proposed to introduce a new internal stairwell connecting the ground floor and lower ground floor in the location marked C on Figure 3.1, which will also allow natural light to reach the lower ground floor (see Figures 3.2 and 3.3). This would be achieved by creating a curved opening in the slab between ground floor and lower ground floor level, inserting an elegant helical stair with metal railings around the perimeter of the opening at ground floor level and extending to lower ground floor as a banister. The stair proposed is stylistically appropriate to the 1920s character of the Site, creating a good degree of visual interest in this otherwise unremarkable area of the Site. The insertion of a stair in this location is considered to sustain the heritage significance of the Site by virtue of its high-quality design and location in an area of the building of very low heritage sensitivity.

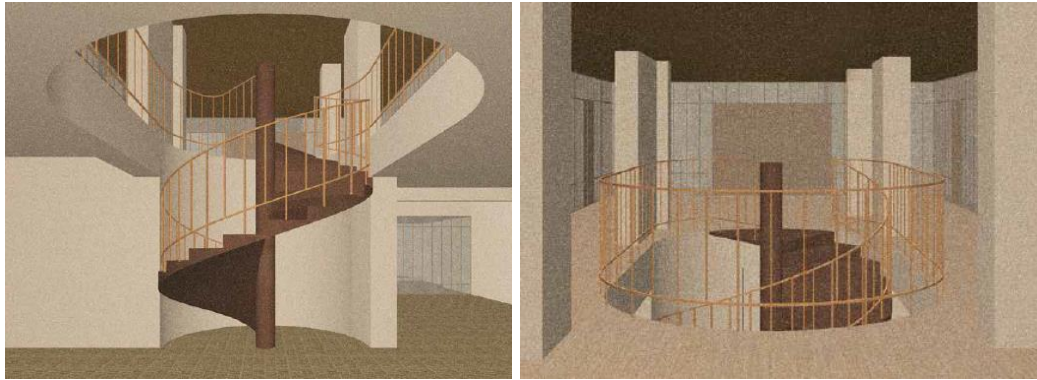


Figure 3.3: Proposed helical staircase.

- 3.13 Additionally, it is proposed to remove existing plasterboard partitions in the area marked D on Figure 3.1. This will reintroduce natural light to the lower ground floor from the pavement lights along Dane Street, by removing existing plasterboard partitions to create a more open-plan workspace. It is also proposed to insert partition walls toward the rear of the Site, to create workspaces, breakout areas, meeting rooms, and offices. These alterations are lightweight interventions located in areas of the Site which do not contribute to the special interest of the Site, and therefore are not considered to impact the heritage significance of the Site.

Ground Floor Level

- 3.14 The ground floor entrance lobby and hall, and the main stair core, are the areas of the Site which retain a sense of its historic character, although the survival of original features is inconsistent. The historic black and white stone floor covering has been retained in the lobby and hall, which also feature typical Art Deco style mouldings, to the cornice, picture rail and skirtings. However, analysis indicates that in the most part, mouldings are recreations, due to the alteration of door openings in these areas as part of the past refurbishment scheme. The main entrance doors, lobby doors and doors leading from the hallway all date from the 2017 refurbishment, and the pendant light fittings to the lobby and hall date from 2001. The existing reception area is a more recent development within the depth of the plan.
- 3.15 The creation of the stair linking ground and lower-ground floor, and the lightwells, has been addressed in the description of alterations at lower ground floor level: the re-opening of the lightwell to the Red Lion Square elevation represents a heritage benefit, reinstating a lost element of the earliest 1925 design intent of the Site. The introduction of the rear light well and new feature stair have no adverse impact on the heritage significance of the Site, as these proposals are situated in the much-altered rear of the Site, which is able to accommodate high-quality alterations, such as those proposed. The stair proposed is stylistically in keeping with the Site, and it and the new rear lightwell are considered to sustain the heritage significance of the Site.
- 3.16 One minor change at this level is the proposal to create a new opening between the lift lobby and the office space, in a 2017 partition, creating a through-route from reception and the lift lobby to the workspace. This impacts only modern material, and is not considered to affect the heritage significance of the Site.

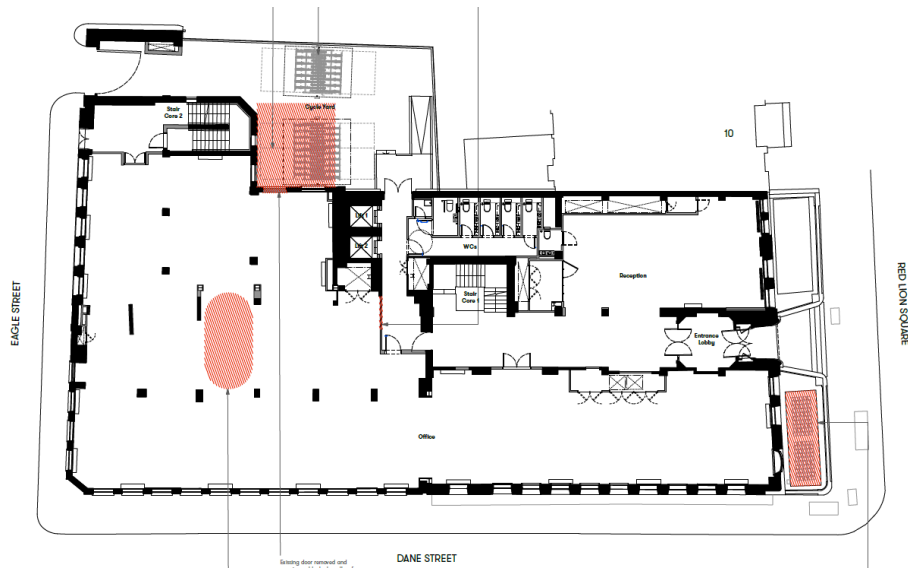


Figure 3.4: Proposed demolition at ground floor level.

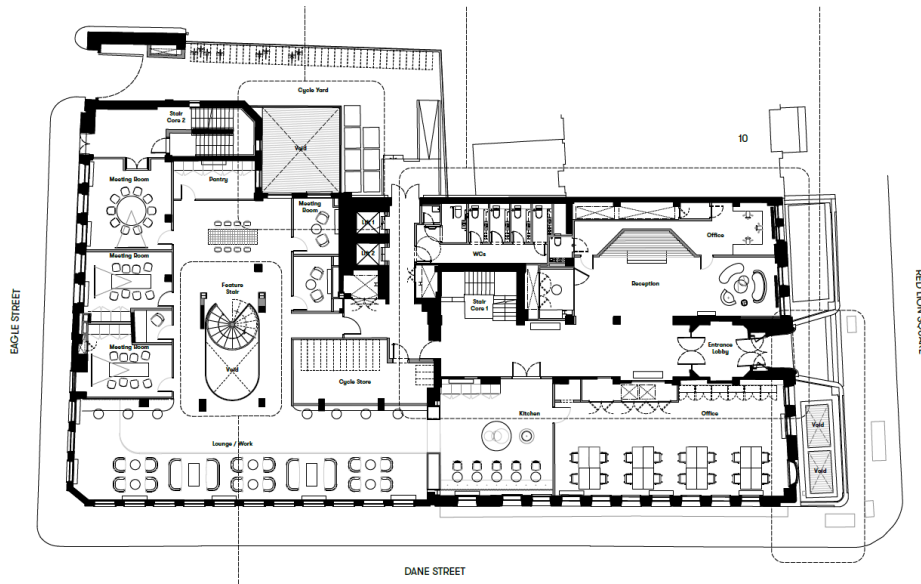


Figure 3.5: Proposed layout at ground floor level.

3.17 Having slightly more visual impact are the proposed changes to the reception area, illustrated in Figures 3.4 – 3.6: however, these changes are in an area of no special interest (the reception), due to the alterations undertaken in the 2000s. This includes the insertion of partition walls, including a feature wall behind the reception desk, and some redecoration works as part of the redesign of the entrance. Existing mouldings, doors and floor coverings would be retained in the linked entrance hall, but it is proposed to renew the replica 2001 pendant light fittings and 2017 wall fittings with a new scheme of high-quality light fittings. However, the material affected by these changes is not historic, and the proposed alterations to the reception area would overall sustain the heritage significance of the Site.

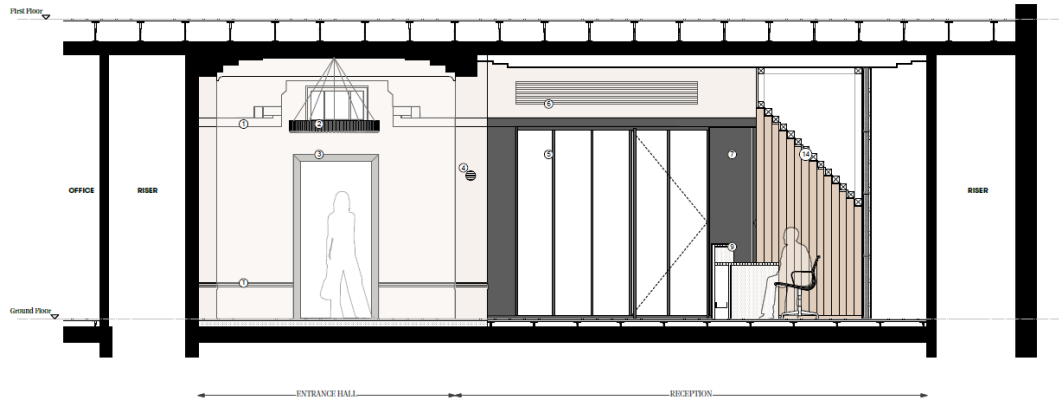


Figure 3.6: Section of proposed entrance hall and reception.

3.18 Finally, at ground floor level it is also proposed to insert a number of partition walls toward the rear of the Site, creating communal workspaces, lounges, meeting rooms, a cycle store, and offices, in addition to the renewed reception area. These changes are lightweight, and do not affect the heritage significance of the Site.

First to Third Floors

3.19 At first, second and third floor level, no original internal decorative features or fittings survive. The internal finishes to much of these floors are modern, dating from the 2017 refurbishment, and the floor plan of these levels is open-plan. The scheme proposal seeks to insert partition walls at these levels, to increase the functionality of the upper levels by creating distinct rooms and spaces. Although these upper levels are of little or no heritage interest and able to accommodate substantial alterations, the scheme proposals set out minimal interventions and fixings to the existing fabric.

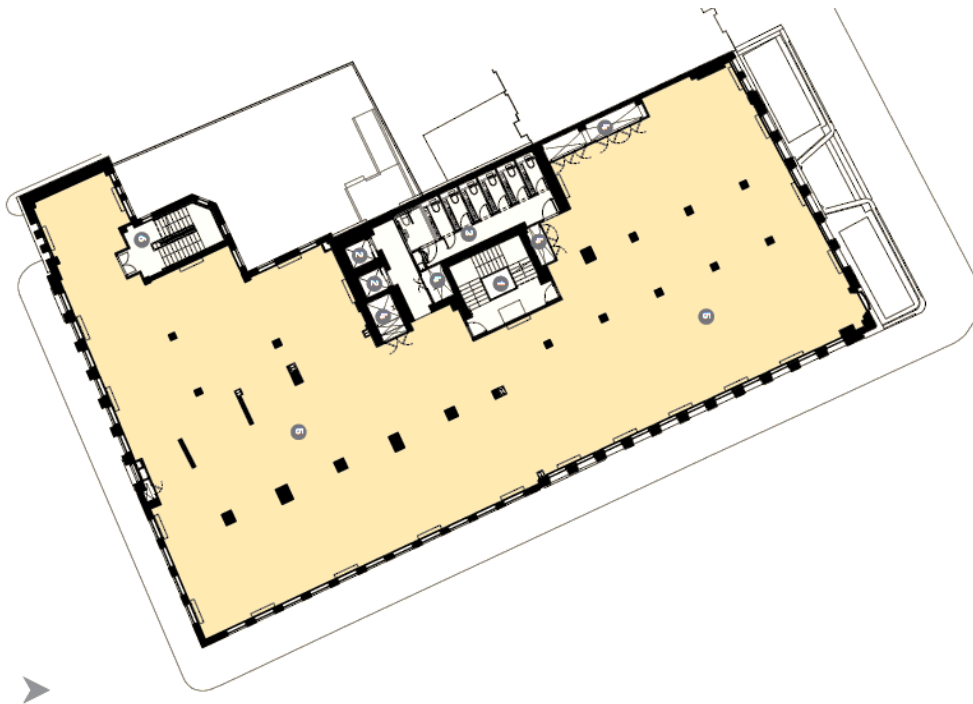


Figure 3.7: Indicative existing floor plan at first, second and third floor level.

- 3.20 The proposals at first, second and third floors retain the existing internal stair core, lift cores and WCs, altering only the open-plan office spaces, which will be sub-divided to create a range of private offices, break-out areas and associated facilities. This will be achieved by the installation of partitions affixed to the plasterboard-lined piers between window bays. Partitions are each floor will be arranged to create a central corridor, from which a range of offices are accessible. Overall, this change will have no effect on the heritage significance of the Site.



Figure 3.8: Indicative proposed layout at first, second and third floor level.

Fourth Floor

- 3.21 At fourth floor level, it is proposed to create a new roof terrace in the south east corner of the building, where an accessible area of flat roof currently exists. This includes the removal of the existing balustrade, and its replacement with a new balustrade to match the existing design, which meets loading requirements. A new composite decking floor finish to match existing terrace will also be installed. This would not harm the significance of the listed building or conservation area.
- 3.22 Additionally, it is proposed internally to introduce partition walls to create a number of offices leading off a central corridor, as at the lower levels. Given the lack of heritage significance at fourth floor level, the replacement of the open-plan design with a partitioned layout is considered to sustain the heritage significance of the Site.

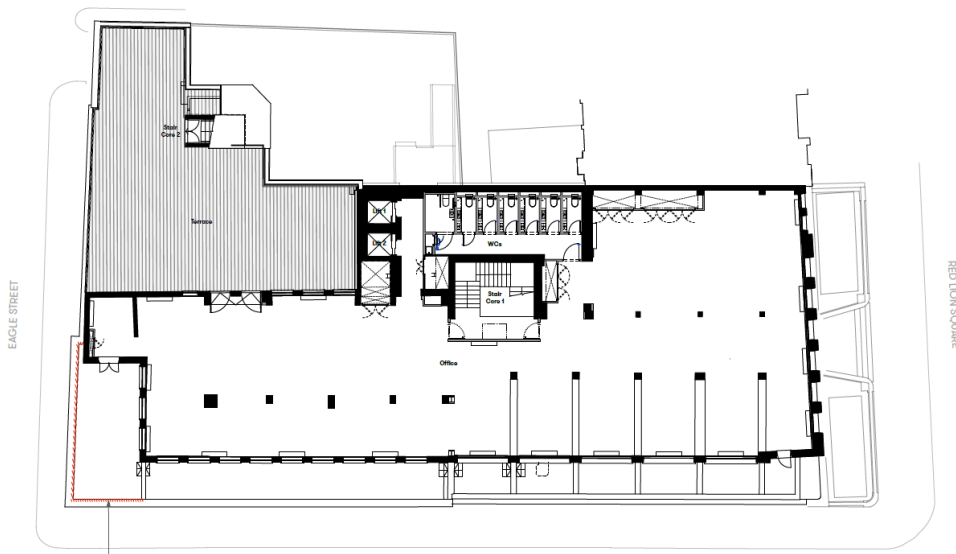


Figure 3.9: Fourth floor proposed demolition plan.

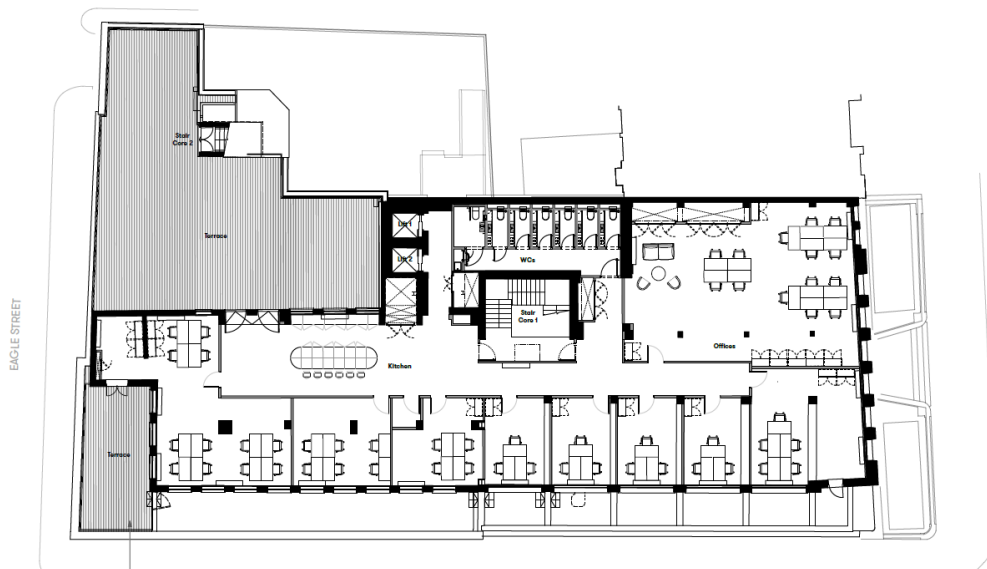


Figure 3.10: Proposed fourth floor plan.

Roof Level

- 3.23 At roof level the new scheme also requires the installation of five additional condensers, again as part of the overall upgrade of the existing office space and servicing. 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 (further altered as a result of approved works at this level in 2017/2018). Overall these modern functional elements at roof level do not contribute to the significance of the listed building (or conservation area).
- 3.24 Overall plant equipment would be housed either within existing roof level structures, screened by recently installed enclosures, or open to the elements as existing. New elements would be positioned discreetly within the depth of the plan of the building

alongside existing taller roof elements. Importantly, this has been designed to ensure that any visual impact on public views from surrounding streets within this part of the conservation area has been avoided. 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 screens existing roof top elements. The significance of the listed building and conservation area would not be harmed by this change relative to the existing condition at roof level.

Review of Heritage Legislation and Policy

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.25 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.
- 3.26 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 or enhance the character and appearance of the conservation area.

National Policy and Guidance

NPPF 2018 and NPPG

- 3.27 In accordance with the requirements of paragraph 189 the significance of the affected designated heritage assets have been described in an appropriately proportionate manner, appended to this report and the previous 2017 Heritage Statement.
- 3.28 It is demonstrated in this report that these proposals are in accordance with overarching paragraphs 192 and 193 of the NPPF. Overall these proposals would conserve the designated heritage assets of the listed building and conservation area, and would sustain or enhance their significance, character and appearance.
- 3.29 As no harm has been identified to the relevant heritage assets, paragraphs 194-196 do not apply.

Local Policy and Guidance

London Plan 2016

- 3.30 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 2016.

Camden Core Strategy 2010

- 3.31 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

- 3.32 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.
- 3.33 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.
- 3.34 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.

4. Summary and Conclusions

- 4.1 In summary, the affected designated heritage assets of the listed building, Summit House, and surrounding conservation area have been identified and their significance described in **Section 2**. The new application proposals have been informed by this understanding, and **Section 3** then undertakes a review these proposals and then assesses their impact on the significance of the heritage assets. This is set out in light of the relevant statutory duties, planning policy and guidance.
- 4.2 This new scheme for the installation of a stair between ground and lower ground floor level; two lightwells between ground and lower ground floor level; the reconfiguration of space at each level; and the redecoration of the reception area. These changes would not affect fabric or features of little or no special interest: the most substantial alterations are confined to a part of the internal envelope of the property of no sensitivity in heritage terms, and the reintroduction of the lightwell to the Red Lion Square elevation of the Site represents a heritage benefit or enhancement to the listed building and surrounding conservation area. New roof plant would also be discreetly positioned to avoid views from the street.
- 4.3 Overall, this scheme would conserve the designated heritage assets of the listed building and conservation area, and also sustain or enhance their significance. The alterations to the Red Lion Square lightwell would restore coherence to the building's scheme of fenestration and external façade, in line with the originally intended 1925 design for the building. The remaining elements of the proposal do not impact historic fabric, and will reflect the distinctive character of the site, particularly with the introduction of the 1920s-inspired helical stair between ground and lower ground floor level.
- 4.4 These proposals would therefore preserve the special interest of the listed building, and also preserve the character and enhance the appearance of the conservation area. The significance of this designated heritage assets would be sustained, accordingly. This would accord with the principles of the statutory duties set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF 2018 and supported by NPPG, and relevant local policy and guidance, including the Further Alterations to the London Plan 2016, Camden's Core Strategy 2010 policy CS14 and Camden's Development Policies 2010 DP25.

Appendix 1: Heritage Statement – Summit House (January 2017)

Appendix 2: Updated 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) 2018

5. The National Planning Policy Framework (NPPF) was introduced in March 2012 as the full statement of Government planning policies covering all aspects of the planning process. This document was revised and re-published by the Ministry of Housing, Communities and Local Government in July 2018.
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 16 of the NPPF outlines the Government’s guidance regarding conserving and enhancing the historic environment in more detail.
8. Paragraph 189 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 190 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 192 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 193 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. Paragraph 194 sets out that any harm to, or loss, of significance of a designated heritage asset should require clear and convincing justification.
12. Paragraph 195 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 196 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 200 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.
15. Paragraph 201 notes that not all elements of a conservation area will necessarily contribute to that asset's significance, but that loss of a building or element which contributes positively to the significance of a conservation area should be assessed under either Paragraph 195 or 196 as appropriate.

National Guidance and Advice

National Planning Practice Guidance (NPPG) 2014

16. 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.

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 published by English Heritage (now Historic England) in 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.

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.

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

20. 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.

Minor Alterations to the London Plan (MALP) 2016

21. The London Plan was adopted by the Greater London Authority in July 2011 and sets out the Spatial Development Strategy for all Boroughs within Greater London. It replaces the London Plan (consolidated with alterations since 2004), which was published in February 2008. The Plan has been subsequently revised (Further Alterations to the London Plan 2015), and has been amended again to ensure consistency with the Framework and other changes since 2011. The Minor Alterations to the London Plan were published on 14th March 2016. Policy 7.8 (Heritage assets and archaeology) 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 Local Development Framework 2010-2025

22. 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.
23. 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 Local Development Framework 2010-2025

24. The Camden Council Development Policies 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.

25. 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."

26. 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

27. 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

28. 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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