Ms Emily Whittredge Direct Dial: 020 7973 3721

London Borough of Camden

Development Management Our ref: L01086350

Town Hall

Judd Street

London

WC1H 9JE 7 August 2019

Dear Ms Whittredge

**Arrangements for Handling Heritage Applications Direction 2015**

**& T&CP (Development Management Procedure) (England) Order 2015**

**& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**ST GEORGES CATHEDRAL REDHILL STREET LONDON NW1 4BG**

**Application Nos 2019/2937/L** **&** 2019/2639/P

Thank you for consulting Historic England on the above applications and for arranging the helpful site visit on 2 August 2019.

St. George's Cathedral is administered by the Antiochian Orthodox Society of Britain and does not benefit from the Ecclesiastical Exemption; therefore listed building consent is required for this proposal. As owners of the freehold, the Diocese of London will also need to approve any proposed alterations.

**Summary**

I have spoken to my colleagues at Historic England and can now offer you the following advice.

Historic England acknowledges the needs of this active cathedral community, and has no objection to the principle of a first floor extension to the existing annex; however we consider the proposed staircase in the Nave to be harmful and unjustified.

**Significance**

St George’s Cathedral was formerly Christ Church, Albany Street, built in 1836 by Sir James Pennethorne, as a late addition to the East fringes of John Nash’s Regent’s Park. The exterior of the building is built in a heavy Greek revival style, using stock brick with stone and cement dressings. The interior is galleried and has been added to and refurbished numerous times by Rev. William Dodsworth who added much of the interiors embellishment, and Butterfield who oversaw general redecoration between 1866-85, adding extravagant marble and tiles, and fittings including the Font, Pulpit, carved stalls and pews. The nave is largely free of any modern intervention.

The Cathedral is listed grade II\* in recognition of its outstanding architectural and historical significance. It has been included on Historic England’s Heritage at Risk register for a number of years due to the poor condition of the building, with an immediate risk of rapid deterioration or loss of fabric.

**Impact**

The proposals include the erection of a first floor extension to the north east annex of the Cathedral to provide additional ancillary space, toilet and kitchenette. The extension will be accessed via a new staircase within the nave, removing an altar on the ground floor and two sets of stalls on the gallery. The new stairs are proposed to be boxed in, and painted and finished to match existing details.

**Policy**

In accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, your Council must pay special regard to the desirability of preserving any features of special architectural or historic interest when considering planning applications which affect listed buildings including their setting, as well as preserving or enhancing the character of Conservation Areas as per Section 72 of the Act.

The National Planning Policy Framework 2019 makes clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and that the bar is set higher for grade I and II\* buildings. This is irrespective of whether any potential harm amounts to substantial harm or less than substantial harm to its significance (paragraph 193).

Paragraph 194 is clear in stating ‘any harm to a listed building requires clear and convincing justification’, and must be outweighed by the public benefits of the proposal (paragraph 195).

**Position**

We acknowledge the needs of the Cathedral, the growing need to provide space for uses other than worship and the limited options available to them for expanding. The erection of a first floor extension to the north east annex is therefore accepted in principle, and a similar application for this addition was approved in 2010.

The existing single storey annex facing Little Edward Street and Christ Church School already provides a kitchen, function room, lobby, waiting space, storage and toilets. The 2010 approved application included a stair providing access to the 1st floor extension included within this existing ground floor annex space.

This has been omitted from the current proposals in order to create two separate rentable spaces. The access to the first floor annex extension is proposed to be provided through the north east section of the nave, demolishing part of the gallery, and relocation of an altar on the ground floor. The nave is the main space within the cathedral, and holds its original, symmetrical plan form, is relatively intact and possesses most of its decorative fittings and pews and stalls. Historic England considers the encroachment within the nave for the benefit of access to an extension harmful, unjustified, and unnecessary.

We feel other options could be explored within the annex by rationalising and reworking the existing layout on the ground floor to provide the facilities required by the Cathedral, without needing to locate a staircase in the main body of the Cathedral. This could include:

- Reconfiguration/relocation of existing lobby space to incorporate a staircase

- Reworking the proposed plans to exclude the separate kitchenette and use this space to provide a staircase

- Boxing in a smaller staircase from the existing function room space.

**Recommendation**

Historic England considers the proposals will cause harm to the significance of this Grade II\* listed building that has not been clearly and convincingly justified. Historic England objects to the proposals on the basis that they do not meet the terms of legislation and policy set out above, and we are unable to provide our draft letter of Authorisation at this time.

We would welcome the opportunity to advise further as we believe a successful scheme which avoids harm to this designated heritage asset could be brought forward.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service’s published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

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