

**BEIRUT GARDEN**  
**Sovereign House**  
**218-220 Shaftesbury Avenue**  
**London**  
**WC2H 1DP**

## **Heritage Statement**

NGR 530119 181384

Sign-off history

| issue no. | issue date | prepared by                             | reviewed by                                      | approved by                     | reason for issue |
|-----------|------------|---|--|---------------------------------|------------------|
| 1         | 25/09/2020 | Rebecca Reynolds<br>Heritage Consultant | Sam Abelman<br>Lead Consultant<br>Built Heritage | Sam Abelman<br>Contract Manager | First issue      |

PO code: P20-331



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Registered in England and Wales

Company registration number 07751831 Charity registration number 1143574  
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Note: site outlines may appear differently on some figures owing to distortions in historic maps. North is approximate on early maps.

# Executive summary

*ZD Design has commissioned MOLA to carry out a heritage statement in advance of proposed development at Nos 218-220 Shaftesbury Avenue, Sovereign House in the City of Westminster. The scheme comprises the refurbishment of the external facia at ground floor level and will include repainting, changing of the lettering, addition of a projecting sign and addition of an LED downlight below the existing awning of No220.*

*The subject site is part of the Grade II listed Sovereign House. The site is a vacant hospitality space situated at ground floor level with entrances at both Nos 218 and 220 and each door has two large windows either side of it.*

*The site lies within the Bloomsbury Conservation Area. There are several other designated heritage assets close to the site.*

*This desk-based study assesses the possible impacts of the proposed development on built heritage assets in and around the site.*

*This heritage statement is required to be submitted with the accompanying planning application.*

## ***This report has the following findings:***

- The proposed redecorating of the facias will be subtle and not visually dominant. The function of the site will remain the same so the changes will not be out of place.*
- All additions will be removable and will not harm the site.*
- The proposed redecorations will have a neutral impact on the site and surrounding heritage assets.*

## ***The main recommendation is as follows:***

- There are no recommendations.*



Fig 1 Location of subject site showing individually designated heritage assets (indicated by red squares on the map) (Source: MOLA ArcGIS)

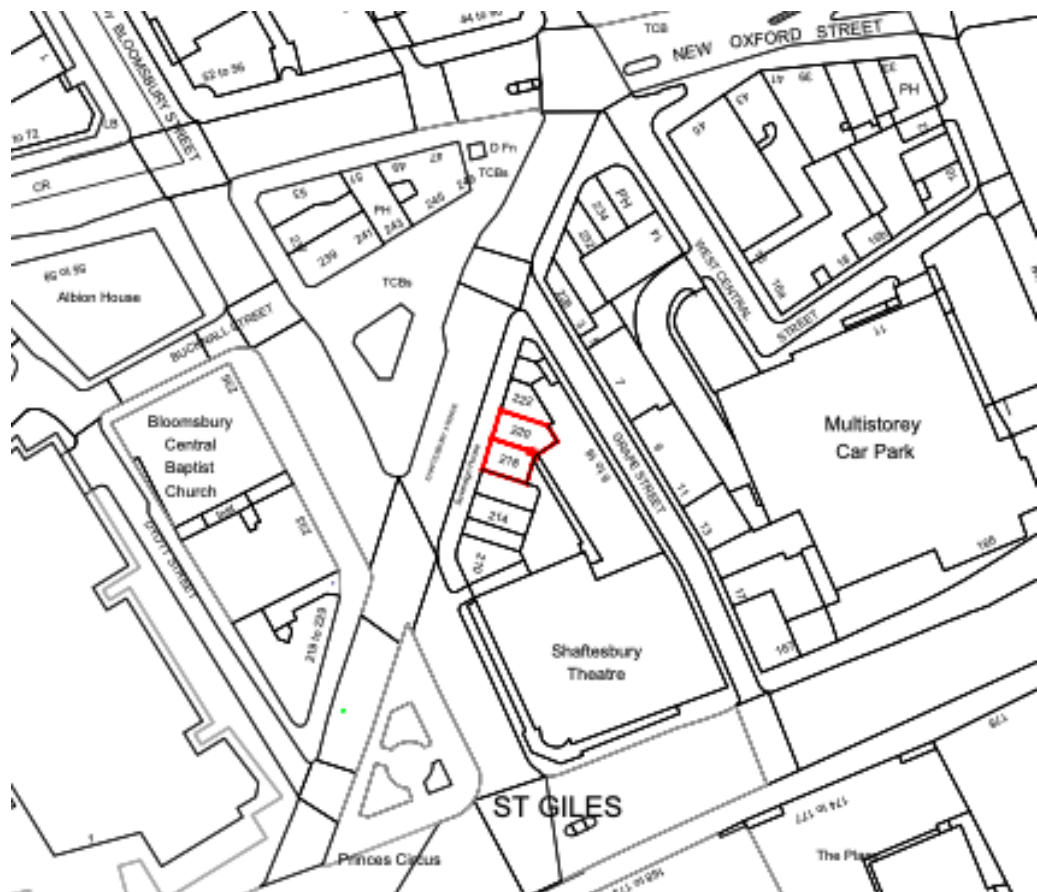


Fig 2 Site location (Source: ZD Design)

# 1 Introduction

## 1.1 Origin and scope of the report

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- 1.1.1 ZD Design has commissioned MOLA (Museum of London Archaeology) to carry out a heritage statement in advance of proposed development Nos218-220 Shaftesbury Avenue, Sovereign House in the City of Westminster (National Grid Reference 530119 181384: Fig 1). The scheme comprises the refurbishment of the external facia at ground floor level and will include repainting, changing of the lettering, addition of a projecting sign and addition of an LED downlight below the existing awning of No220.
- 1.1.2 This desk-based study assesses the impact of the scheme on built heritage assets (standing buildings). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or possible heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.3 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2012, 2014, 2019) and to standards specified by the Chartered Institute for Archaeologists (CIfA Dec 2014a, 2014b), Historic England (EH 2008, 2017), and the Greater London Archaeological Advisory Service (GLAAS 2014). Under the 'Copyright, Designs and Patents Act' 1988 MOLA retains the copyright to this document.
- 1.1.4 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author and MOLA, correct at the time of writing. More information about the nature of the present buildings, and/or more detailed proposals for redevelopment may require changes to all or parts of the document.

## 1.2 Heritage assets

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- 1.2.1 The subject site is a nationally designated (protected) heritage assets; such as scheduled monuments, listed buildings or registered parks and gardens nor is the site situated in a Conservation Area. The site is within the ground floor of a Grade II listed mansion block (NHL 1245859).
- 1.2.2 To the south and north of the site are other properties located within the same Grade II listed mansion block. Opposite the site to the west is the Grade II listed Bloomsbury Central Baptist Church (NHL 1271628) and the Grade II listed No233 Shaftesbury Avenue (NHL 1271626). To the south of the mansion block containing the site is the Grade II listed Shaftesbury Theatre (NHL 1378647).
- 1.2.3 The site lies within the Bloomsbury Conservation Area.

## 1.3 Aims and objectives

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- 1.3.1 The aim of the assessment is to:
- identify the presence of any known built heritage assets that may be affected by the proposals;
  - describe the significance of such assets, as required by national planning policy;
  - assess the likely impacts upon the significance of the assets arising from the proposals; and
  - provide recommendations for further assessment where necessary of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon buried heritage assets and/or their setting.

## 2 Methodology and sources consulted

### 2.1 Baseline

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- 2.1.1 The baseline for this assessment has been determined primarily through desk-based research into designated and undesignated heritage assets on and near the site of the proposed development. It has been confirmed and extended by a site visit by a MOLA Built Heritage Consultant.
- 2.1.2 The following are the principal sources consulted:
- MOLA - in-house Geographical Information System (GIS) with statutory designations GIS data, the locations of all key indicators of known prehistoric and Roman activity across Greater London, past investigation locations, projected Roman roads and burial grounds from the Holmes burial ground survey of 1896; georeferenced published historic maps; Defence of Britain survey data, in-house archaeological deposit survival archive; and archaeological publications.
  - Historic England - information on statutory designations including scheduled monuments and listed buildings, along with identified Heritage at Risk
  - Groundsure - historic Ordnance Survey maps from the first edition (1860-70s) to the present day;
  - ZD Design – Signage Drawings for Planning (ZD Design, 02/08/2020);
  - Internet - web-published material including LPA local plan, and information on conservation areas and locally listed buildings.

### 2.2 Significance

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- 2.2.1 The assessment considers all structures on or near the site of a proposed development to have potential significance as heritage assets. From this start position, the values and significance of each asset will be determined using criteria set out in Historic England (formerly English Heritage)'s *Conservation Principles, Policies and Guidance* (EH 2008). All structures with a level of significance as heritage assets will be discussed in the report and included as material considerations in the assessment. Structures of negligible value and significance as heritage assets will not be assessed further and will generally be excluded from the report except where there is a need for explanation of their exclusion from the assessment, such as being part of the site.
- 2.2.2 For each built heritage asset to be considered, a description will be provided leading to a statement of significance for that asset. Section 10 sets out the criteria used to determine the significance of heritage assets. This is based on four values set out in Historic England's *Conservation Principles, Policies and Guidance* (EH 2008), and comprise evidential, historical, aesthetic and communal value. The report assesses the likely presence of such assets within (and beyond) the site, factors which may have compromised buried asset survival (i.e. present and previous land use), as well as possible significance.
- 2.2.3 The significance of the asset is derived from its historical, evidential, communal and aesthetic values, these in turn derived from the building's fabric, design, landscape and history.
- 2.2.4 In the case of Conservation Areas, the significance will be primarily found in their character assessments and those aspects of the historic built environment that make positive contributions to them.
- 2.2.5 The methodology for assessing the setting of designated heritage assets follows best practice as covered in Historic England's Good Practice Advice (GPA) document 3 (HE 2017). The basis for this methodology is set out below:
- All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies.

Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

#### 2.2.6 GPA3 sets out this methodology in stages, or steps:

Step 1 - identify the asset(s) likely to be affected and the extent of setting

Step 2 - assess how and to what degree the setting makes a contribution to the significance of the assets

Step 3 - assess the effect of the proposed development on the significance of the asset

Step 4 - seek to maximise enhancement and minimise harm; and

Step 5 - document and monitor outcomes

#### 2.2.7 Steps 1 and 2 are dealt with in section 4.5, step 3 in section 7.2 and step 4 in sections 8.2 and 8.3. Step 5 is the preserve of the LPA.

## 2.3 General Planning Advice 3 (GPA3) *The Setting of Heritage Assets* (Historic England 2015)

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2.3.1 General Planning Advice 3 (GPA3) *The Setting of Heritage Assets* (Historic England 2015) sets out the broad methodology for assessing the impact of development on the significance of assets. This suggests a staged approach - Step 1 being the identification of assets potentially affected; Step 2 being to assess whether, how and to what degree the setting makes a contribution to the significance of the heritage asset(s); Step 3 is to assess the effects of the proposed development, whether beneficial or harmful, on that significance; Step 4 is to explore the ways to maximise enhancement and avoid or minimise harm; and Step 5, which is the preserve of the LPA, is to make and document the decision and monitor outcomes.

2.3.2 This report has identified that the heritage assets which could potentially be affected are the site dwelling itself as a Grade II listed building, the nearby Grade II listed buildings and the Conservation Area (Step 1). There are several locally listed buildings within the vicinity of the site, however most of these do not have a view of the site and so will not be affected.

2.3.3 In detail, Step 2 considers:

- a) the physical surroundings of the asset, including its relationship with other heritage assets;
- b) the way the asset is appreciated; and
- c) the asset's associations and patterns of use.

2.3.4 Commentary of the various facets of these factors is as follows:

a) The asset's physical surroundings

- *Topography* – the area is generally flat.
- *Aspect* – the site faces on to Shaftesbury Avenue.
- *Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)* – the site is part of a large Grade II listed mansion block so the properties either side of the site and above are also designated heritage assets. There are two Grade II listed buildings to the west and one further south. The site lies within a Conservation Area.
- *Definition, scale and 'grain' of surrounding streetscape, landscape and spaces* – the area is primarily made up of 4-5 storey buildings of mixed use with commercial premises at ground floor level.
- *Formal design e.g. hierarchy, layout* – the building in which the site is located was intended to contain commercial units on the ground floor.
- *Orientation and aspect* – as above.



- *Historic materials and surfaces* – the site is a glass fronted restaurant in a building built of brick and terracotta.
- *Green space, trees and vegetation* – opposite the site is a triangular plot of open space with trees at the junction of Shaftesbury Avenue and Bloomsbury Street.
- *Openness, enclosure and boundaries* – the site is open to Shaftesbury Avenue.
- *Functional relationships and communications* – none in particular.
- *History and degree of change over time* – the site and the surrounding area have been built up for over 200 years and have not changed significantly over time.

#### b) Experience of the asset

- Surrounding landscape and townscape character – the surrounding area is typical of central London within the Bloomsbury and St Giles districts.
- *Views from, towards, through, across and including the asset* – the site faces onto Shaftesbury Avenue and the two Grade II listed buildings to the west.
- *Visual dominance, prominence or role as focal point* – the area is dominated by large wide 4-5 storey buildings and some modern high rises further afield which form a focal point.
- *Noise, vibration and other nuisances* – high traffic noise.
- *Diurnal changes* – minor changes as a result of diurnal changes.
- *Sense of enclosure, seclusion, intimacy or privacy* – the site is open to Shaftesbury Avenue and so is not enclosed.
- *Land use* – the land provides commercial use.
- *Accessibility, permeability and patterns of movement* – there is high pedestrian traffic along the street and high passing traffic.
- *Degree of interpretation or promotion to the public* – the area is characteristic of its time.

#### c) Associations

- *The assets associative attributes* – the site is representative of the historical development of the area.
- *Associative relationships between heritage assets* – as above.

2.3.5 The proposed works are moderate in nature. There will unlikely be any impact on the setting of the conservation area as a result of the proposed development, which is further detailed in section 7 of this report (Step 3).

2.3.6 The proposed works are moderate in nature and separate from the nearest designated heritage asset (Step 4).

Step 5 will be undertaken by LPA in due course.

## 2.4 Impact

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2.4.1 Impacts are those actions associated with the proposed development with potential to alter the significance of a heritage asset through affecting the values that contribute to it.

2.4.2 For each built heritage asset, the potential impacts of demolition and construction will be assessed in terms of how they may alter these values and, by extension, significance of each.

2.4.3 For Conservation Areas, the assessment will focus on the preservation and/or enhancement of their historic character.

## 2.5 Conclusions and Recommendations

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2.5.1 The built heritage assessment will conclude with a list of impacts, potentially ranging from major adverse to major positive, on built heritage assets in the baseline.

2.5.2 This list is primarily intended to inform mitigation, whether through design or ameliorative

archaeological recording of assets in advance of their alteration.

## 3 Policy Baseline

### 3.1 Introduction

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- 3.1.1 There is potential for the proposed development to impact on the significance of designated and undesignated built heritage assets and Conservation Areas. These impacts will likely take the form of demolition or other physical alteration to buildings, demolition and new construction that may alter the setting of designated heritage assets, and demolition and new construction that may affect the character and setting of Conservation Areas.
- 3.1.2 The following lays out the general criteria upon which the proposed development will be assessed.

### 3.2 Statutory protection

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#### *Listed Buildings and Conservation Areas*

- 3.2.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a Conservation Area are protected by law. Grade I are buildings of exceptional interest. Grade II\* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

### 3.3 National Planning Policy Framework

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- 3.3.1 The Government issued the *National Planning Policy Framework* (NPPF) in March 2012 (DCLG 2012) and supporting *Planning Practice Guidance* in 2014 (DCLG 2014). The 2012 NPPF was revised and a new NPPF published in July 2018, with minor revisions in February and July 2019 (MHCLG 2019).

#### *Conserving and enhancing the historic environment*

- 3.3.2 The NPPF section concerning “Conserving and enhancing the historic environment” (section 12 of the NPPF 2012) has been replaced by NPPF 2018 Section 16 (unchanged in February 2019), reproduced in full below:

**Para 184.** Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

**Para 185.** Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

**Para 186.** When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

**Para 187.** Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

**Para 188.** Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

### **Proposals affecting heritage assets**

**Para 189.** 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

**Para 190.** Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

**Para 191.** Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

**Para 192.** In determining applications, local planning authorities should take account of:

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

### **Considering potential impacts**

**Para 193.** 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 the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

**Para 194.** Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

**Para 195.** Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

**Para 196.** Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

**Para 197.** The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

**Para 198.** Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

**Para 199.** Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

**Para 200.** Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

**Para 201.** Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

**Para 202.** Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

## 3.4 Greater London regional policy

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### *The London Plan*

3.4.1 The overarching strategies and policies for the whole of the Greater London area are contained within the London Plan of the Greater London Authority (GLA March 2016). The current 2016 consolidation Plan is still the adopted Development Plan. However consultation on a draft new London Plan is open until 2nd March 2018, and the Draft London Plan is a material consideration in planning decisions (GLA website, 2017).

3.4.2 Policy 7.8 of the adopted (2016) London Plan relates to Heritage Assets and Archaeology:

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.

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.

F. Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G. Boroughs, in consultation with English Heritage [now named Historic England], Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

- 3.4.3 Para. 7.31A supporting Policy 7.8 notes that 'Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.'
- 3.4.4 It further adds (para. 7.31B) 'Where there is evidence of deliberate neglect of and/or damage to a heritage asset the deteriorated state of that asset should not be taken into account when making a decision on a development proposal'.
- 3.4.5 Para. 7.32 recognises the value of London's heritage: '...where new development uncovers an archaeological site or memorial, these should be preserved and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset'.

#### *The Draft New London Plan showing Minor Suggested Changes*

- 3.4.6 The current 2016 consolidation Plan is still the adopted Development Plan. However, consultation on revisions to the Plan was open until 2nd March 2018, and the *Draft New London Plan* is a material consideration in planning decisions Following Examination in Public, a "Consolidated Suggested Changes Version" was published in July 2019 (GLA website, 2019). The Mayor is also in the process of adopting the New London Plan. Most recently, following independent examination and receipt of the Inspector's report, the Intend to Publish Plan (2019) was published in December 2019. The site is not allocated for any particular use within the Draft New London Plan however, the relevant policies and considerations from the New London Plan now form a material consideration in the determination of planning applications.
- 3.4.7 Policy HC1 "Heritage conservation and growth" of the *Draft New London Plan* (as set out here incorporating published minor changes to the consultation Draft) relates to London's historic environment:
- A Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
  - 2) utilising the heritage significance of a site or area in the planning and design process
  - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
  - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

3.4.1 Para. 7.1.8 adds 'Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset should not be taken into account when making a decision on a development proposal'

Para 7.1.11 adds 'Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

## 3.5 Local planning policy

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3.5.1 Following the Planning and Compulsory Purchase Act 2004, Planning Authorities have replaced their Unitary Development Plans (UDPs), Local Plans and Supplementary Planning Guidance with a new system of Local Development Frameworks (LDFs). UDP policies have been either 'saved' or 'deleted'. In most cases archaeology policies are likely to be 'saved' because there have been no significant changes in legislation or advice at a national level.

3.5.2 The London Borough of Camden's Local Plan was adopted on 3rd July 2017 and replaced the Development Core Strategy and Development Policies. Design and Heritage, Policy D covers heritage issues. More specifically:

### **Policy D2 - Heritage**

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

### **Designated heritage assets**

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.
- e. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

## 4 Built Heritage Baseline

### 4.1 History of the site

- 4.1.1 The building within which the site is located dates to 1902-1908. However the area of the site has been built up from at least the mid to late 16th century as is evidenced by the 1572 map of Braun and Hogenberg (not reproduced). At this time the site was on the fringe of London and while mildly built up the site would have been just south of open fields.
- 4.1.2 Over the following centuries, the area became more and more built up and by Rocque's map of 1746 (not reproduced) the whole area around the site is built up with an intricate network of roads. The site is located just north of St Giles, which as a parish was one of the poorest and most notorious slums of 18th and 19th century London full of gin addicts and prostitutes.
- 4.1.3 The mid 19th century saw development to the north-east of the site with the laying out of New Oxford Street as means of easing congestion and regenerating the area by cutting through the slums. Further changes and redevelopment continued throughout the later part of the 19th century as the existing street layout did not appear until the sometime before the Ordnance Survey of 1894 (Fig 3). The site is seen to occupy several buildings as well as empty plots.
- 4.1.4 The Ordnance Survey map of 1916 (Fig 4) shows the site as it now is with the Princess Theatre to the south, now Shaftesbury Theatre. No further changes are noted.



Fig 3 Ordnance Survey map of 1894, not to scale



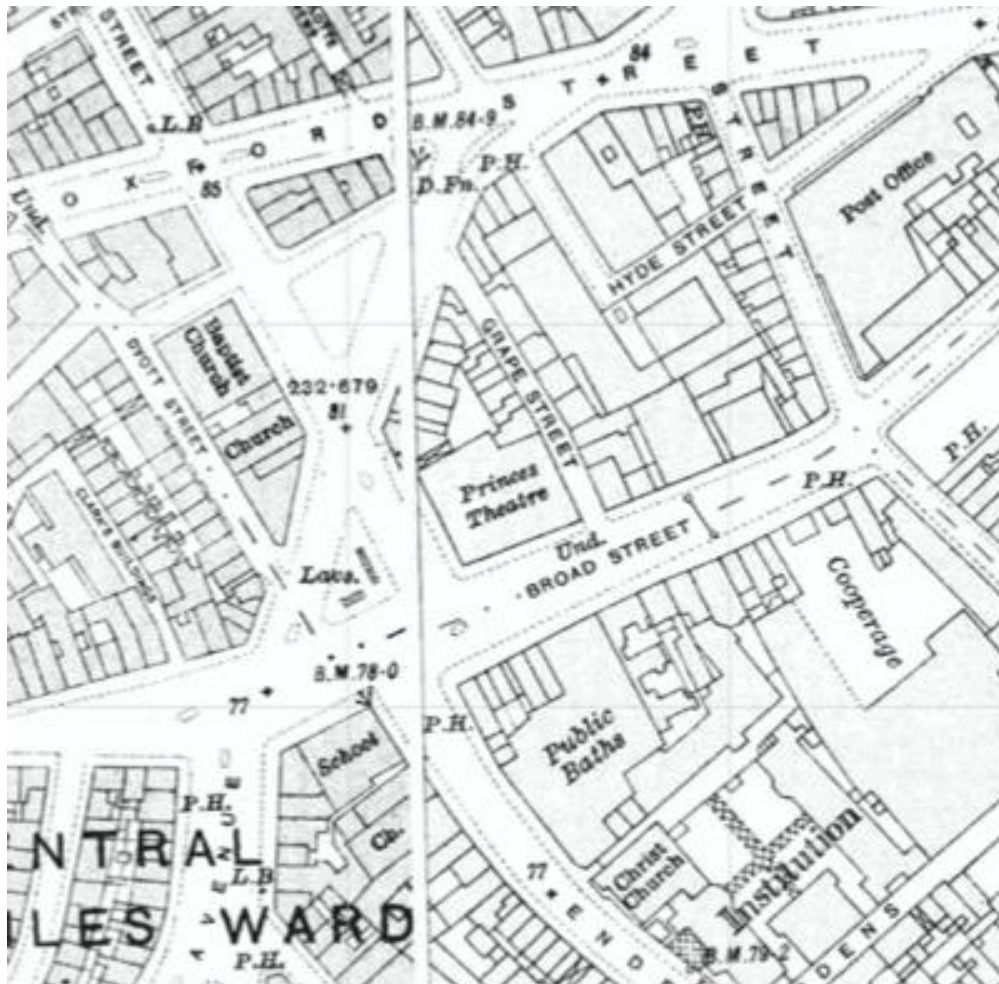


Fig 4 Ordnance Survey map, 1916, not to scale

## 4.2 Site description

4.2.1 The site is within a Grade II listed mansion block, Sovereign House, described the National Heritage List as:

TQ3081SW 798-1/105/1850 CAMDEN SHAFTESBURY AVENUE (South East side) Nos.210-226 (Even) Sovereign House 07/05/96 GV II Includes: Nos.2-20 King Edward Mansions GRAPE STREET. Shops with former showrooms and offices over, flats over shops to Grape Street range. 1902-8. Almost certainly by C Fitzroy Doll, surveyor to the Bedford Estate and the local District Surveyor.

Brick with exuberant terracotta dressings and decorations, slate roofs with high stacks dressed in terracotta. Angled plan of two intersecting ranges with central courtyard serving flats reached under No.210 Shaftesbury Avenue. EXTERIOR: five storeys and attics. Profoundly asymmetrical composition. Angled two-bay range with projecting two-storey oriel adjoins Shaftesbury Theatre (qv), then thirteen-window range to Shaftesbury Avenue. Corner bartizans with projecting turrets, that and its adjoining bay to Grape Street with machicolations, as has a similar turret to right of centre of main composition and two three-storey oriels. These and oriel set over entrance to chambers at right of composition are all mounted on fat columns set between shopfronts and first-floor former showrooms, and with undersides embellished with organic decoration. The other shops separated by fluted Roman Doric engaged columns with dentil cornice, over which are first-floor former showrooms separated by engaged Ionic columns. The shopfronts largely renewed in sympathetic fashion: that to No. 218 may be original; first-floor showrooms, now offices, with large plate glass

windows under small-paned toplights, little altered. All windows to upper floors mullion and transom casements in terracotta surrounds, with notched lintels linked as bands across composition, and with many projecting bands, moulded cornice and parapets. Attic dormers inserted mid-C20 and not of interest. Balcony over entrance to offices. Return to Grape Street (King Edward Mansions) similarly treated though with higher stacks, with broad, square bartizan on corner, a round one in the middle and one of each at far end, all with machicolations. Three oriels inbetween, one round on moulded plinth, one canted (both with balustraded tops) and one square which rises to the line of a heavy modillion cornice. Shop fronts to ground floor, some with cast-iron grilles, have simple mouldings and tripartite toplights. First floor former showrooms with small top lights in broad mullion and transom casements. Flats served by courtyard to rear of No. 210 Shaftesbury Avenue, with stone access balconies on cast-iron brackets, sash windows and part-glazed doors.

INTERIORS: not inspected.

Included primarily for the quality of its street facades, an exceptionally powerful example of Doll's work for the Bedford Estate using fine terracotta.

- 4.2.2 The site is a vacant restaurant premises located at the ground floor of Nos218-220. The site has a part timber part glazed entrance door at both No218 and No220 with large windows either side.
- 4.2.3 The entrance to No218 is set back with tall narrow bowed windows either side before the large floor to ceiling windows. The windows are timber framed as is the door with a glazed panel above it and a carved timber lintel. There is a step covered in red tiles to enter the premises. Above this section of the site is a black projecting awning with the name of the current restaurant. Above the awning are two small pendant lights.
- 4.2.4 The facia to No220 is very different and is likely to have previously been similar to that of No218 and altered some time in the 20th century. There is a part timber part glazed door with two large windows either side. There are wide timber architrave surrounds between the window and door and a glazed panel above the door. This facia is plainer with none of the carved timber as seen on No218. There is also a black awning but with no pendant lights above. Above the awning is a large panel with the name of the restaurant in capital black letter set in relief.
- 4.2.5 Both facias are painted a light brown colour.



Fig 5 Existing facia of No220 (Source: ZD Design)



Fig 6 Existing facia of No218 (Source: ZD Design)

### 4.3 Nearby heritage assets

4.3.1 To the west of the site is the Grade II listed Bloomsbury Baptist Church described as:

Baptist church. c1845-8. By John Gibson. For Sir Samuel Morton Peto on speculation because he considered a church was needed in the area. Grey brick with stone dressings and vertical bands. Early Italian Gothic style. Rectangular plan. EXTERIOR: 2 storeys and attics. West front of 3 windows flanked by rectangular towers. 3 central moulded arch entrances above which a Lombardic frieze and large rose window flanked by 2 round-arched windows. Deep Lombardic frieze beneath arcaded attic windows crowned by a balustrade. 4-stage towers with vertical bands and small windows; 4th stages are belfries with round-arched openings, friezes and cornices having trefoil enriched dies at angles; formerly with short spires, removed due to war damage. INTERIOR: horseshoe-shaped auditorium with curved gallery supported on polygonal cast-iron columns; the gallery with arcaded-patterned front. Decorated square columns rise from gallery to roof. Good curved pews, and stained glass incorporating texts. Balcony reached by winding wrought-iron stairs in angles either

side of narrow central entrance foyer refitted c1960s. HISTORICAL NOTE: this was the first Baptist chapel to stand prominently on a London street, looking like a "church", reflecting the improved status of Victorian dissenters. Legend records that when Peto sought to lease the land, the First Commissioner of Woods & Forests told him that Nonconformist chapels were too dull: he liked a church with a spire. "A spire?" exclaimed Peto, "My Lord, we shall have two!"

4.3.2 Just south of the above mentioned Baptist church is No233 Shaftesbury Avenue, also Grade II listed described as:

Office block. c1929. By Leo Sylvester Sullivan; carved details probably by Henry Poole. Steel-frame faced in Portland stone. Neo Egyptian style. 6 storeys; 6-bay range. Bay to right has vertically set slit lights, grouped in threes, to full height stairwell; Pharaoh's head carved above fluted coved cornice with winged disc (symbol of god Horus) over square-headed doorway with moulded architrave. To left is 3-bay entrance front with cushion capitals to columns, set in slightly projecting portico with winged disc feature set in coved palm-leaf cornice; square-head glazed entrance. Upper floors have metal framed windows and metal spandrel panels, with palm-leaf and Classical detailing, recessed between a giant order of piers continued to flattened palm-leaf capitals set beneath plain frieze with central winged disc feature and attic storey with square-headed windows; palm-leaf carving to boldly projecting cornice. INTERIOR: not inspected.

4.3.3 To the south of of the site is the Grade II listed Shaftesbury Theatre:

Includes: Shaftesbury Theatre HIGH HOLBORN. Theatre. 1911. By Bertie Crewe. Terracotta, stone and brick in elaborate Renaissance style. Rectangular plan on a corner site, the main entrance being at the angle of Shaftesbury Avenue and High Holborn. EXTERIOR: 3 storeys, 4 bays to each return, the entrance bay being curved. Ground floor rusticated with continuous plain canopy over. 1st floor rusticated, much of the fenestration covered by hoarding. 2nd floor with Diocletian windows & oculi in alternate bays, the entrance having rectangular windows with enriched architraves, all having large consoles under a cornice and elaborate parapet. Above the entrance front, a cupola. INTERIOR: foyer and booking hall with delicate plaster decoration. Auditorium of considerable richness with 2 cantilevered balconies, the fronts varied in form and decoration. Rectangular ceiling with enriched cove and cornice and circular flat-domed centre. Segmental proscenium arch with figure reliefs in spandrels over. Bow-fronted boxes paired in two tiers and framed by giant Ionic columns rising from heavy console brackets and carrying an entablature with figures, the whole composition crowned by a semicircular arch and a heavily moulded eaves cornice. In the arch tympanum a sculptural group is set over each upper box. Balustraded balcony terraces at upper box level run laterally along the walls towards the boxes and balustraded front to filled orchestra pit. HISTORICAL NOTE: the theatre was designed as a melodrama house.

4.3.4 The site is located within the Bloomsbury Sub Area New Oxford Street/High Holborn/Southampton Row Conservation Area. The Conservation Area was designated in 2011 and is described as:

This sub area is characterised by areas of large-scale, late 19th and early 20th century blocks fronting busy thoroughfares. Development followed the construction of new routes combined with the widening of earlier streets, thereby cutting through the earlier 17th and 18th century street pattern. The narrow back streets in the sub area reflect the earlier layout. The predominant use is commercial, with a range of shops, banks, offices, hotels and theatres. Residential accommodation generally takes the form of mansion blocks.

# 5 Statement of Significance

## 5.1 Introduction

5.1.1 The subject site is a nationally designated (protected) heritage assets; such as scheduled monuments, listed buildings or registered parks and gardens. There are several Grade II listed building nearby and a Conservation Area.

## 5.2 Significance Criteria

5.2.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity, and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):

- *Evidential value*: the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
- *Aesthetic value*: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
- *Historical value*: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
- *Communal value*: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.

5.2.2 Table 2 gives examples of the significance of designated and non-designated heritage assets.

*Table 2: Significance of heritage assets*

| <b>Heritage asset description</b>  | <b>Significance</b>                        |
|--|--|
| World heritage sites<br>Scheduled monuments<br>Grade I and II* listed buildings<br>Historic England Grade I and II* registered parks and gardens<br>Protected Wrecks<br>Heritage assets of national importance   | Very high<br>(International/<br>national)  |
| Historic England Grade II registered parks and gardens<br>Conservation areas<br>Designated historic battlefields<br>Grade II listed buildings<br>Burial grounds<br>Protected heritage landscapes (e.g. ancient woodland or historic hedgerows)<br>Heritage assets of regional or county importance | High<br>(national/<br>regional/<br>county) |
| Heritage assets and locally listed with a district or local (ie parish) value or interest for education or cultural appreciation   | Low<br>(Local)                             |
| Historic environment resource with no significant value or interest  | Negligible                                 |
| Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined  | Uncertain                                  |

## 5.3 Conservation Areas

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- 5.3.1 Conservation areas have a high significance baseline due to their evidential and historic value.
- 5.3.2 The aesthetic value of Conservation Areas derives from the architecture within them and is often the reason for their designation. The communal value of Conservation Areas derives from the benefit visitors and residents get from being able to appreciate the architectural development.
- 5.3.3 The Bloomsbury Conservation Area is likely designated because of its high percentage of buildings of architectural merit and its historic pattern of development. It has a high evidential and historic value due to its 19th century development.

## 5.4 Listed building

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- 5.4.1 The Grade II listed the site and its immediate neighbours have a high significance baseline.

### *Evidential and Historic Value*

- 5.4.2 The site has a high evidential value as evidence of early 20th century development of the Bedford Estate in a very historic part of central London.
- 5.4.3 Historical value tends to be illustrative or associative. There is no known historical relationship between the site and the surrounding buildings.

### *Aesthetic Value*

- 5.4.4 The site has a high aesthetic value due to its contribution of historic vernacular architecture which can be appreciated by all as it is a building with commercial premises and is highly visible from Shaftesbury Avenue and Bloomsbury Street. Additionally, the architectural style contributes to the neighbouring locale.

### *Communal Value*

- 5.4.5 As a building with commercial premises and offices it has a high communal value for its visitors but also for those passing by as it is in an area with high pedestrian and vehicle traffic.

### *Summary of Significance*

- 5.4.6 Based on the above analysis the site and its neighbouring properties have a high significance.
- 5.4.7 The Grade II listed Bloomsbury Baptist Church also has a high significance baseline.

### *Evidential and Historic Value*

- 5.4.8 Places of worship have a high evidential value as evidence of past patterns of worship, and in this case a further historical evolution of the Church of England.
- 5.4.9 Historical value tends to be illustrative or associative. There is no historic association of note that is known.

### *Aesthetic Value*

- 5.4.10 The church has a high aesthetic value due to its contribution of historic vernacular architecture which can be appreciated by all as it is a public building highly visible from the surrounding streets.

### *Communal Value*

- 5.4.11 Places of worship have been focal points of most communities due to their importance in births, marriages and deaths as well as weekly prayer. Today, such buildings are still used for religious and non religious functions and therefore have a high communal value.

### *Summary of Significance*

5.4.12 Based on the above analysis the Bloomsbury Baptist Church has a high significance.

5.4.13 No233 Shaftesbury Avenue is also a Grade II listed building and has a high significance baseline.

### *Evidential and Historic Value*

5.4.14 No233 Shaftesbury Avenue has a high evidential value as evidence of historic commercial development in this central part of London.

5.4.15 Historical value tends to be illustrative or associative. There is no historic association of note that is known.

### *Aesthetic Value*

5.4.16 The high aesthetic value of this building comes from its contribution of historic vernacular architecture which can be appreciated by all due to its prominent location at the juncture of Shaftesbury Avenue and Bloomsbury Street. Its architectural style also contributes to the designation of the Conservation Area.

### *Communal Value*

5.4.17 As a commercial building it will have a high communal value, its prominent position also allowing the public realm of the street to appreciate this building.

### *Summary of Significance*

5.4.18 Based on the above analysis No233 Shaftesbury Avenue has a high significance.

5.4.19 As a Grade II listed building, the Shaftesbury Theatre also has a high significance baseline.

### *Evidential and Historic Value*

5.4.20 The theatre has a high evidential value of the redevelopment in the area in the early 20th century and the provision of new recreational buildings such as theatres.

5.4.21 Historical value tends to be illustrative or associative. There is no known historical relationship between the site and the surrounding buildings.

### *Aesthetic value*

5.4.22 The high aesthetic value of this building comes from its contribution of historic vernacular architecture which can be appreciated by all due to its prominent location at the juncture of Shaftesbury Avenue and Bloomsbury Street. Its architectural style also contributes to the designation of the Conservation Area.

### *Communal value*

5.4.23 The communal value is also high due to it being a commercial building and its location which allows passers by to view it.

### *Summary of Significance*

5.4.24 In summary, the Shaftesbury Theatre has a high significance.

## 6 Proposed development

### 6.1 Proposal

6.1.1 The proposal is for the redecorating of the facias of both Nos218 and 220 as the premises are now under new ownership.

6.1.2 The details of the redecorating proposals of No220 are:

- Repainting of all timber sections to Delux Grass Green matt finish
- The addition of an LED downlight beneath the existing awning
- The addition of a fascia sign on the existing timber panel above the door and windows. These will have 20mm older brass matt finish projecting letters and will replace the existing letters.
- Just before the architectural column separating No220 from No218 there will be a side hanging projection sign with brass matt finish brass letters on an alubond box which will be green powder coated. The sign will be illuminated and its dimensions will be W700 x H600 x D80 mm.

6.1.3 The details of the redecorating proposals of No218 are:

- Repainting of all timber sections to Delux Grass Green matt finish
- The addition of a projecting fascia sign on the windows either side of the door. These will project by 20mm and will be brass letters with a matt finish and will be placed on a 2mm back plate.
- The addition of a projection logo sign above the door which will be brass with a matt finish also place on a 2mm back plate. The logo will project 20mm.



*Fig 7 Proposed fascia of No220 (Source: ZD Design)*





*Fig 8 Proposed fascia of No218 (Source: ZD Design)*

# 7 Impact of Proposed Development

## 7.1 Impact on site

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- 7.1.1 The proposal will have a neutral on the impact on the site as the site is currently a commercial premise providing food so the function and redecorating is entirely superficial and reversible.
- 7.1.2 The colour will change but it will still be a subtle colour. The existing premises already have projecting letters above the door so the change will not be significant.
- 7.1.3 The projecting sign will be at No220 whose frontage has changed and is no longer original so the addition of the sign will not have a detrimental impact.
- 7.1.4 The LED projecting light will also be at No220 and will be under the awning so it will have a very minimal visual impact.
- 7.1.5 The addition of the lettering and logo to the windows of No218 will also only have a minimal impact. All will be attached to a glass base plate so will not damage the fenestration which may be older than that of No220.
- 7.1.6 All additions including the sign, LED lighting and lettering can be removed and reversed.

## 7.2 Impact on nearby heritage assets

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- 7.2.1 As the site is currently a commercial premise offering food, none of the proposed works will change the overall appearance of the site and therefore will have a neutral impact on all surrounding identified heritage assets.
- 7.2.2 The changes are all slight and none are visually intrusive or dominant. The colour scheme is subtle and the brass matt lettering will not be visually dominant.

## 8 Conclusions and Recommendations

### 8.1 Conclusions

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- 8.1.1 The proposed redecorating of the facias will be complimentary and not visually dominant. The function of the site will remain the same so the changes will not be out of place.
- 8.1.2 All additions will be removable and will not harm the site.
- 8.1.3 The proposed redecorations will have a neutral impact on the site and surrounding heritage assets.

### 8.2 Recommendations

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- 8.2.1 There are no recommendations.

## 9 Bibliography

### 9.1 Published and documentary sources

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### 9.2 Other Sources

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