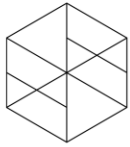


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Heritage Appraisal – Proposed Memorial Sculpture
The British Medical Association, BMA House,
Tavistock Square, London, WC1H 9HW
November 2021





1 Introduction

1.1 The following Heritage Appraisal has been prepared in support of a proposed new memorial sculpture to be erected within the courtyard of BMA House, no. 20 Tavistock Square, London, WC1H 9HW (the site). The proposed sculpture will be a memorial to doctors and all healthcare workers who have lost their lives to the Covid-19 virus.

1.2 The proposed sculpture will be erected in a private courtyard where there is a history of commemorative sculpture and art. Already within the courtyard are the grade II listed Remembrance Gates by Sir Edwin Lutyens, erected to commemorate the BMA members who died in WWI, and the grade II* listed fountain which remembers the men and women of the medical profession that died in WWII. With the wider site's Physic Garden, there is also a memorial to the victims of London's July 7 2005 terrorist attack. There is clearly a tradition of remembrance and paying tribute to those who have lost their lives in internationally significant events.

1.3 Sculptor Richard Tannenbaum, who has been commissioned to create the permanent memorial, has described his work as follows:

From a supporting base the stone sculpture rises in a continuous loop of jointed sections. I aim to convey the sense of continuity of care that the NHS has provided; that because of the sacrificial service of the health workers it has continued to function ceaselessly throughout the pandemic; that though individual parts have been particularly hard-pressed, the integrity of the whole has been maintained and that we the public are inextricably linked with those NHS workers who lost their lives in caring for us.

1.4 The proposed sculpture is discussed and illustrated in more detail below but it is clearly important to underline the intent and ambition from the outset.

Historic environment designations

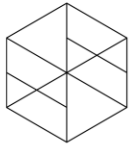
1.5 BMA House is listed at grade II, with Lutyens' Remembrance Gates included within the listing (the full list description is included at Appendix A). The proposed location for the memorial, the eastern courtyard (cover image), forms part of the second phase of work undertaken by Sir Edwin Lutyens at BMA House. The list description describes the courtyard as follows:

The wings to the N, S and E of this courtyard are the original block designed by Lutyens. W façade 'Wrenaissance' style; 3 storeys and 5 bays. Portland stone faced ground floor with round-arched openings linked by impost bands, except those flanking the central entrance which are square-headed. All with keystones. Hexastyle-in-antis stone Corinthian columns from 1st to 2nd floor supporting a modillion pediment with a clock in the tympanum. Entablature continued one bay each side, supported at angles by Corinthian pilasters. Each bay with architraved sash with bracketed pediment. Small, architraved sashes with keystones in attic storey with stone cornice. North and south blocks, forming the sides of the courtyard, similar to those of western courtyard.

1.6 Also designated is the grade II* listed War Memorial Fountain which is located centrally within the east courtyard (figure 1). The list description for the fountain is as follows:

War memorial with four figurative sculptures. 1954 by James Woodford for the British Medical Association. Bronze fountain in circular pool with surrounding steps and four carved statues in Portland stone representing Sacrifice, Cure, Prevention, and Aspiration. Memorials to civilian professions are a feature of Second World War commemoration, and this is a particularly good example.

1.7 BMA House also forms part of the Bloomsbury Conservation Area. It is located within Sub Area 6 of the conservation area: Bloomsbury Square/Russell Square/Tavistock



Square. The proposed sculpture will be located in an entirely private courtyard, set well back from the street. It is considered that the proposed sculpture will have no impact on the character and appearance of the conservation area, except as it relates to the character and appearance of BMA House. The principal consideration in this case is therefore the effect of the proposals on the significance of the listed buildings/structures that define the eastern courtyard.



Figure 1: The War Memorial Fountain, BMA courtyard.

Research

1.8 The historic development of BMA House is well documented, particularly in *BMA House and its Architects: A History and a Guide* (Jane Smith, 2013). This document has been used to inform the following appraisal as has the detailed listed description for the site provided at Appendix A.

Report structure

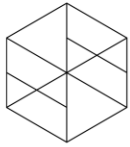
1.9 The following report provides a brief overview of the historic development and

significance of the proposed site and its context and considers the effects of the proposal on significance and against relevant historic environment policy. Section 2 summarises the historic development of the site and Section 3 considers the proposals and their effects on the historic environment.

1.10 The proposed sculpture will stand independently within the existing courtyard and will not directly affect the listed building. Accordingly, listed building consent is not required in this case although planning permission is of course required.

Author

1.11 This appraisal has been prepared by Kate Graham of The Heritage Practice. Kate Graham (MA (Hons) MA PG Dip Cons AA) has extensive experience in dealing with proposals that affect the historic environment having in recent years been Design and Conservation Manager at the London Borough of Islington and Senior Historic Buildings at Areas Adviser at Historic England. She also has an extensive background in research, in policy analysis and in understanding historic buildings and places. She has trained as a historian and has a specialist qualification in building conservation. Kate is also a member of the London Borough of Islington Design Review Panel and the London Borough of Hackney Design Review Panel.



2 The site and significance

2.1 The following section provides an overview of the historic development of the proposed site and immediate context and considers its significance and special interest.

Historic development

2.2 The early phases of the British Medical Associations' (BMA) history can be summarised as follows:

- The BMA moved from Worcester to London in the 1870s and after sharing premises with the British Medical Journal, it moved to no. 161a Strand, a pre-existing building designed by C R Cockerell;
- In 1902, the BMA decided to redevelop the site with a building designed by Charles Holden (now Zimbabwe House, grade II* listed);
- By 1920, membership of the BMA had grown again and the organisation had outgrown its building on the Strand. Looking around for new premises, it found the incomplete headquarters of the Theosophical Society in Tavistock Square (figure 3).

2.3 The Theosophical Society was founded in 1875 and is still an international movement. Sir Edwin Lutyens was engaged by the society to build their new headquarters and temple, a commission apparently assisted by the fact that Lutyens' wife was a member of the Theosophists. According to Jane Smith in *BMA House and Its Architects*, 'the building that Lutyens designed for the Theosophists was more ambitious than the one that stands today and certainly more ambitious than the building the BMA took over in 1923' (figure 3).

2.4 Smith writes that: 'Lutyens had designed the Theosophical Society Headquarters in a neoclassical style. It was intended to be a quadrangular building with a large cupola on the western side of the

courtyard, over its arched entrance. The entire building would have extended from Burton Street in the east to Tavistock Square in the west. When building stopped only three sides around the courtyard had been built, with the Great Hall in the centre, flanked by two wings of rooms and offices to the north and south. These buildings have Portland stone façades with large arched openings on the ground floor, red brick above with Portland stone dressings, and green Westmorland slate roofs. The north and south wings have no further decoration except for pediments and balustrades on the first floor windows, but the main façade of the Great Hall is surmounted by a pediment supported by stone Corinthian columns. The buildings are classical in their proportions and austere in the best classical traditions, and they concede little to their steel-frame construction. (figures 4-7).

2.5 Figure 3 shows the courtyard as the BMA found it in 1923. Lutyens' building was incomplete and the whole project for the Theosophical Society had been beset by financial difficulties and a poor working relationship. The courtyard proper is shown as being very plain with a lone tree providing some respite in an otherwise very severe and almost forgotten looking courtyard. The OS map extract of 1914 provided at figure 2 shows Lutyens work to this point, three blocks forming the courtyard surrounding by terraced housing.



Figure 3: OS map extract, 1916.

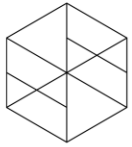


Figure 3: The courtyard in 1923.



Figure 4: Courtyard, north elevation



Figure 6: Courtyard, south elevation.



Figure 5: Courtyard, east elevation (c.f. figure 3).



Figure 7: The later western extension, fountain and gates.

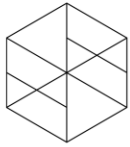


Figure 8: Commemorative plaque associated with the gates and WWII memorial.



Figure 9: The gates, west side.



Figure 10: The gates, east side.

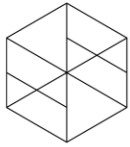
2.6 The BMA intended to finish the courtyard on the west side but was unable to do so until 1926. It asked Lutyens to finish off the end walls with hung tile and to design the interiors (figure 11). Lutyens was also commissioned to design the ornamental gates that would close off the west side of the courtyard as a WWI memorial. These gates are still *in situ* but it is likely that they were moved slightly east when the front wing was completed in the late 1920s (figures 8-10).



Figure 11: BMA house prior to the construction of the front wing.

2.7 The plaque associated with the gates and WWII memorial (figure 8) notes that the gates '*enclose the court of honour in which stands the memorial dedicated in 1954.*' The words '*court of honour*' clearly define the special status of the courtyard as a place for commemoration and remembrance.

2.8 The finished BMA house was opened by King George V and Queen Mary and the gates were dedicated by the Archbishop of Canterbury in July 1925. The courtyard is described as being decked with awnings with a band playing on the grass in the centre of the courtyard. The courtyard was not intended to be a garden in the truest sense but instead was more of a formal response to a very formal architectural setting. Lutyens laid out a garden behind the south wing which is much softer and has a very different aesthetic quality to the east courtyard.



2.9 The BMA continued to extend BMA house well into the post-war period. After the 1920s, new architects such as C Woner Smith, continued Lutyens' work in new wings and extensions. The main change in respect of the courtyard in the post-war period was the decision to commemorate the BMA members who lost their lives during WWII (figure 12).



Figure 12: The courtyard prior to the construction of the memorial fountain.

2.10 At the time, various ideas on the form this memorial should take were proposed. Some members favoured an educational trust while others suggested that the courtyard should be glazed over to form an outdoor room and filled with palms. Eventually the BMA decided on a fountain and it accepted the designs of James Woodford RA in collaboration with S Rowland Pierce FRIBA for a bronze fountain and Portland stone surround with four Portland stone figures representing Sacrifice, Cure, Prevention and Aspiration.

2.11 The fountain sits within a circular grassed area, edged in Portland stone. More recent works to the courtyard have included the

provision of resin bonded gravel around the central fountain and granite setts and paving terminating the courtyard finish as it meets the principal elevations of the building (figure 13).

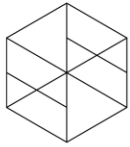


Figure 13: Existing courtyard finishes.

Significance

2.12 The existing courtyard, defined by Lutyens' buildings and gates and the later extension, is very impressive and clearly of architectural interest and distinction. As shown in figures 4-7, the five storey north and south elevations match and are symmetrically composed over five principal bays. The ground floor is in Portland stone with five arched openings. The first floor is defined by five principal windows above each of the arched openings, two smaller windows sit either side of the central window.

2.13 Above is a second floor with 8x12 sashes and then at third floor there are smaller 8x8 windows. There is a clear architectural hierarchy to each level, a characteristic of Lutyens' adopted neoclassical architectural style.



2.14 Above a strong Portland stone cornice, there is a further attic storey with 8x8 sashes with keystones above.

2.15 The east elevation is differently composed on a more monumental scale. The shift in approach reflects the character and use of the interior where the principal rooms of the Theosophist Society and later the BMA were positioned. The east elevation shares the broadly five bay composition of the north and south elevations but with Portland stone applied higher to the face of the ground floor giving the impression of a raised storey.

2.16 Above are ten monumental Corinthian pilasters and columns that divide the elevation into five bays. Within each bay is a huge 24x30 sash window. Surmounting the central three bays is a pediment in brick with a clock at its centre. An attic storey is visible either side of the pediment. Overall, the architectural impression is one of a three storey building. The architectural distinction between the east and north and south elevations gives additional prominence to the west elevation but symmetry is retained

2.17 The courtyard sits at the centre of this grand architectural composition and relates positively to its proportions and architectural character. Aesthetically, the space as a whole is clearly of architectural and historic interest.

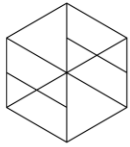
2.18 The association with prominent architects and designers is clearly of strong historic interest, particularly that association with Sir Edwin Lutyens. His first phase of construction was complemented by the later Remembrance Gates that obviously have communal significance for their commemorative purpose. This also applies to the very high quality post-WWII memorial. The sense of a 'court of honour' is palpable in this context.

2.19 The proposed site is also significant for its associations with two organisations that emerged in the 19th century: the British Medical Association and the Theosophists Society. The

site has been shaped through the aims and ambitions of both organisations and this clearly contributes to the historic interest of the site.

2.20 The architectural interest of the courtyard as a whole is made more cohesive through the consistent use of materials, particularly in the Portland stone which characterises the most prominent parts of the architectural composition to the principal elevations (the contrast with the red brick is marked). Portland stone has been used in the WWII memorial and this has the effect of giving the courtyard a unified palette in materials, tone and colour. As a result, the WWII memorial fountain is distinct but also blends into and is clearly secondary to the architecturally robust, tall elevations that surround the courtyard.

2.21 The existing courtyard therefore has clear architectural, historic and communal value and significance for reasons described above. The following section considers the effects of the proposals on this significance.



3 The proposals and their effects

3.1 The following paragraphs provide a brief description of the proposed sculpture and considers its effects against the significance of the existing courtyard and relevant historic environment policy (Appendix B).



Figure 14: The proposed form of the sculpture

The proposals

3.2 The proposals are referred to in the Introduction above. The sculpture will take a form as illustrated in figure 14. It will be created from Portland stone, linked together with steel rods. It will sit on a Portland stone plinth of c. 800mm³ and be 2.2m tall. This gives a total overall height of c.3m.

3.3 The proposed plinth and sculpture will be positioned against the north elevation of the building between the central arched opening and the next opening moving eastwards (figure 8). It will be an entirely freestanding piece and have no direct effect on the fabric of the listed building. The sculpture cannot be centrally located or in the corners of the courtyards because of the arched opening in these areas. Positioning the sculpture in the proposed

location means that it will enjoy an accessible and visible position while allowing the fountain to remain as the principal architectural feature within the square.



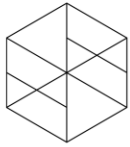
Figure 15: The north elevation with the proposed site marked.

3.4 The height of the plinth has been chosen to relate to the 'plinth' of the wall behind with the sculpture rising approximately to the height of the string course at the springing point of the arches to the various openings (figure 14 is not an accurate representation of the proposed scale). This means that the Portland stone sculpture and plinth blend into the stone 'base' of the listed building, respecting certain architectural details of the courtyard composition.

3.5 As noted in the Introduction, the proposed sculpture is the focus of an important and commendable ambition of the BMA to honour those that have lost their lives during the Covid-19 pandemic. The proposed sculpture is an entirely appropriate addition to the 'court of honour', a part of BMA House that has a long history of commemoration and remembrance.

Effects

3.6 As already noted, the proposed scheme will not have a direct effect on the fabric of the listed building. The principal issue for consideration is therefore the effect of the proposed sculpture on the setting of the listed



building and the nearby WWII memorial fountain.

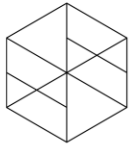
3.7 As shown in the proposed elevations accompanying the application, the sculpture can easily be accommodated within the courtyard without obscuring or impeding an appreciation of its monumental scale, height or architectural significance. In responding to features such as the string course and plinth and in not exceeding the height of the existing arched door openings, the proposed sculpture feels appropriately scaled without challenging the proportions and detail of the existing building.

3.8 The existing memorial fountain has a very strong aesthetic quality and style, a style with which the proposed sculpture does not seek to compete. The integrity, legibility and overall design concept of the fountain would not be challenged by the sculpture and would remain the most prominent feature within the courtyard. Its significance as a work of commemorative art would not be affected.

3.9 In the context of a commemorative courtyard, the proposed sculpture will be an additional and appropriate artistic memorial in a place characterised by similar historic works. As such, the proposed sculpture would be entirely at home and would not cause harm either to the existing listed building, the listed fountain or the spatial quality of the courtyard in which it sits.

3.10 The proposed sculpture will be a memorial to all healthcare workers who have lost their lives to a pandemic of global significance. This introduces further social or communal value into the significance of the courtyard as a whole which, as noted above, has a formal commemorative and memorialising purpose at the heart of BMA House. The proposed sculpture would therefore both respond to and reinforce this particular aspect of the courtyard's significance.

3.11 For these reasons and for others explored above, it is considered that the proposed sculpture would not cause harm to the significance of the listed building or fountain but would be an appropriate addition to a place significant for its architectural, historic and communal values. For these reasons, the proposals would accord with relevant historic environment policy and the statutory provision.



Appendix A:

List Description

CAMDEN, TAVISTOCK SQUARE (East side),
British Medical Association House including
Screen and Gates

09/03/82

GV II

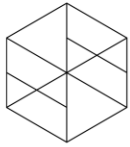
Administrative headquarters of the British Medical Association and rented offices, begun by Sir Edwin Lutyens as the headquarters and temple of the Theosophical Society, his work unfinished. Built in phases as follows: 1913-14 and 1923-25 by Sir Edwin Lutyens (E courtyard and elevation to Burton Street); 1928-9 by Cyril Wontner Smith (central entrance block to Tavistock Square and blocks extending eastwards to form the W courtyard); 1938-49 by Douglas Wood (flanking blocks to entrance); S extension of 1947-50 (the Nuffield Wing), also by Wood and extension on NE of 1959-60. Contains re-used fittings from the previous BMA headquarters at 429, The Strand, built by Percy Adams and Charles Holden in 1908 (qv). MATERIALS: Steel-frame construction. Red brick laid in English bond, Portland stone dressings and green Westmorland slate roofs. Timber sash windows with glazing bars.

EXTERIOR: SW elevation to Tavistock Square. Central entrance block by Wontner Smith, comprising centre bay and 2 slightly projecting bays. 4 storeys, attics and basement. Ground floor Portland stone with 3 round-arched openings with keystones and impost bands to each bay. Central opening with vaulted porte-cochère, flanked by lower pedestrian passageways to courtyard. Plain stone 1st floor band. Centre bay with distyle-in-antis attached Corinthian columns (brick shafts, stone capitals) rising from 1st to 4th floor and supporting a modillion entablature with open segmental pediment, flanked by architraved sashes with keystones in attic storey. Above the vehicle entrance, a tall architraved sash with bracketed

pediment surmounted by a cartouche, a small architraved sash with keystone and keyed oculus in the pediment. Cornice at eaves level and hipped roof, behind which 2 tall moulded brick slab chimney-stacks. Flanking bays with similar columns and entablature. Architraved 1st floor windows with balustraded balconies and bracketed segmental pediments; 2nd and 3rd floor, architraved sashes with an oculus in the attic storeys. Cornices at eaves level and hipped roofs. Courtyard facade similar to centre bay but flanked by extra bays with 2 brick pilasters and narrow architraved sashes. Attached blocks forming the western courtyard of 4 storeys; stone ground floors with 2-light round-arched openings. Plain 1st floor sill band. Architraved sashes; 1st floor with alternating segmental and triangular pediments with balustraded window guards. Stone entablature at 4th floor level; architraved attic windows with keystones, above which a stone cornice. Eastern elevations with brick chimney-stacks rising from 1st floor.

Douglas Wood's extension blocks of 1928-9, flanking the entrance, are 3 bays and 2 storeys each, plus 2-bay, 4-storey pavilions. Stone ground floors with square-headed, square pillar arcading and 2 square-headed, metal framed windows to each bay. Stone-capped parapet at 1st floor level. Square-headed architraved sashes in each bay on 1st floor, above which the cornice. Stone-capped parapet. Each pavilion with slightly projecting stone entrance surround with impost bands, fanlight and 2-leaf wooden doors. Above, tall architraved sash with bracketed pediment and balustraded balcony flanked by similar columns and entablature to the central entrance. Cornice at eaves level and hipped roof. Wood's red brick Nuffield Wing joins on to the southern extension. 3 storeys with single-storey bay to N. Elegant red brick façade in restrained Baroque style, with concave section of 5 bays to the N framed by pilasters. Horizontal rustication to ground floor, parapet with recessed panels.

E courtyard. The wings to the N, S and E of this courtyard are the original block designed by

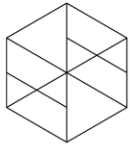


Lutyens. W façade 'Wrenaissance' style; 3 storeys and 5 bays. Portland stone faced ground floor with round-arched openings linked by impost bands, except those flanking the central entrance which are square-headed. All with keystones. Hexastyle-in-antis stone Corinthian columns from 1st to 2nd floor supporting a modillion pediment with a clock in the tympanum. Entablature continued one bay each side, supported at angles by Corinthian pilasters. Each bay with architraved sash with bracketed pediment. Small, architraved sashes with keystones in attic storey with stone cornice. North and south blocks, forming the sides of the courtyard, similar to those of western courtyard. E façade to Burton Place: Handsome elevation in manner of Renaissance palazzo. 2 storeys, 7 windows, framed by pilasters. Round-arched ground floor openings of 2 lights with stone architraves, soffits and keystones, linked by impost bands. Centre opening with 2-leaf doors and fanlight. Plain stone band and stone string at 1st floor level with carved stone shell motifs above each keystone. Tall piano nobile with large square-headed, architraved windows with alternating triangular and segmental pediments. Central window with bracketed cornice surmounted by a multi-layer feature of rectangular blocks. Projecting stone cornice. The pilaster capitals and a stone tablets above central first-floor window left uncarved as boasted work. The adjacent block to the north of this is by Douglas Wood, in an austere neo-Georgian style. This is of lesser interest. INTERIOR: Much of the interior now modern offices. Interiors of note include the Great Hall (intended as the Theosophist's temple), occupying the entire length of the first floor Lutyens E courtyard block. This was subdivided by the insertion of a floor in 1985 to provide a library with offices. 5 bays with aisles; frieze at dado height has series of roundels. Marble columns with Corinthian capitals supporting entablature; beamed compartmented ceiling inserted above cornice level. Above this is the barrel vaulted ceiling, of which only the coffered end bays were finished. The Hastings Room, originally planned by Lutyens as a library. Contains mahogany panelling and

colonnaded screen. Chimneypieces with mahogany timber overmantels, marble slips and decorative tiled insets. Some of these features are understood to have been moved here in 1928-9 from the former BMA headquarters at 429 The Strand, designed by Percy Adams and Charles Holden. The Council Chamber, on the S side of the main courtyard, also has panelling from the Strand building. Coved ceiling. Round-headed windows with imposts linked to cornice. Entrance hall to the right of Wontner-Smith's main gateway has mahogany Tuscan columns, cornice and doors with segmental pediments. The Prince's Room is a square chamber above the main gateway. Recess to corner with Corinthian columns and entablature. Decorative window architraves. Neo-Georgian chimneypiece with marble bolection moulding and lugged timber surround and mirrored overmantel to match windows. Most of these rooms have been altered.

SUBSIDIARY FEATURES: The E and W courtyards are separated by Lutyens' intricate wrought-iron war memorial screen and gates, opened on 13 July 1925 by the Archbishop of Canterbury. The plaque over the main gates is inscribed on the W side MEMORY AND PRAISE, and on the E side: FAITHFUL HAVE BEEN YOUR WARFARE. Statues of Sacrifice, Cure, Prevention and Aspiration of 1952 by J Woodford and S Rowland Pierce form a Second World War memorial.

A small southern courtyard, The Council Garden, between the southern wing of Lutyens' building and the Nuffield Wing, contains a garden with oval pool, set beneath curved retaining wall built in red brick with stone steps and coping. The garden design is attributed to Lutyens, but this has not been established and evidence suggests that it post-dates his involvement. Plaque to Charles Dickens surrounded by bricks from his home on the site. Parapet stones from BMA House forming wall to planting bed and inscribed to commemorate the air raid of 16 April 1940 which damaged the buildings.



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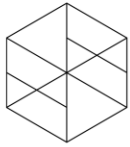
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Heritage Appraisal – Proposed Memorial Sculpture
The British Medical Association, BMA House,
Tavistock Square, London, WC1H 9HW
November 2021

HISTORY: Originally designed by Lutyens as the headquarters and temple of the Theosophical Society, incorporating offices for commercial rental. Lutyens' wife Emily had become a follower of the Theosophists. Construction began in 1913 and ceased in 1914 when the uncompleted shell was commandeered by the Army Pay Office, which fitted out parts of the interior as offices. It is unclear whether the Theosophists ever used the building. After the war ended, the Theosophists had run out of funds. The BMA, founded 1832, bought the lease in 1923, and engaged Lutyens to complete the interior, principally the Great Hall. Wontner-Smith was engaged in 1927 to complete the western part of the building, facing Tavistock Square. The building subsequently expanded as membership increased and to provide income from letting.

SUMMARY OF IMPORTANCE: A fine, albeit incomplete, example of Lutyens' earlier work in the neo-classical idiom. The later additions by Wontner-Smith and Wood, which form the majority of the building, are dignified and well-detailed; the whole ensemble representing a distinguished and coherent complex of multi-phase buildings. Of historic interest as the headquarters of the BMA since 1925.

SOURCES: ASG Butler, *The Architecture of Sir Edwin Lutyens*, 1950; *BMA House: a guide*, Jane Smith, 1988; Pevsner, *The Buildings of England*, London 4: North, 265-266



Appendix B

Relevant Policy Context

The following paragraphs briefly set out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment. The relevant statutory provision for the historic environment is the Planning (Listed Buildings and Conservation Areas) Act 1990.

National Planning Policy & Legislation

Section 16 of the **Planning (Listed Buildings and Conservation Areas) Act 1990** requires that:

“In considering whether to grant listed building consent for any works the local planning authority or 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.”

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that:

“...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

The revised **National Planning Policy Framework 2021** (NPPF) sets out the Government’s planning policies and how these are expected to be applied. There is a general presumption in favour of sustainable development within national planning policy guidance. Paragraphs 189, 190, 192 and 193 are relevant to this application.

Paragraph 194

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.

Paragraph 195

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.

Paragraph 197

In determining planning applications, local planning authorities should take account of:

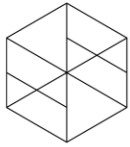
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability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

Paragraph 199

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.

Paragraph 200

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.

Paragraph 202

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.

London Borough of Camden Local Plan

Camden's Local Plan was adopted in June 2017. The most relevant policy in this case is Policy D2: Heritage.

With regard to Conservation Areas, the policy states that the Council will:

- Require that development within conservation areas preserves or, where possible, enhances the character and appearance of the area.

With regard to Listed Buildings, the policy sets out that the Council will:

- Resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.

With regard to rear gardens, part H of the policy sets out that the Council will:

- Preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.