Heritage Potential

Planning & Heritage Assessment

St Andrew's House, 140 Saffron Hill, Holborn, EC1N 8QN

London

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Contents

Heritage Potential
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Report Reference:
2021/5849HER

1. Introduction and Site Description

1.1. This Planning and Heritage Statement has been prepared on behalf of Anglo American Services (UK) Ltd. The statement relates to the proposed works at St Andrew's House, 140 Saffron Hill, Holborn. The site falls within the jurisdiction of LB Camden.

1.2. This Statement has been prepared by Niall Hanrahan of Heritage Potential. Niall has a MSc in Historic Conservation and is also MRTPI accredited. This joint heritage and planning specialism allows him to effectively balance the public benefits of proposals against any identified harm to heritage assets.

1.3. St Andrew's House is Grade II listed and recorded as one of the oldest surviving examples of public housing in England. The site falls within the Hatton Garden Conservation Area.

1.4. Originally built as public housing, and now comprising of 27 apartments, over 4 floors, for Anglo American DeBeers corporate guests. The part 5th floor is a later addition to the building which sits centrally on the roof and provides function space with access onto the flat roof to either side.

1.5. The building has been refurbished a number of times in the past and the interior is notably plain with no features of historic or architectural interest, except for the general floorplan. The principal Saffron Hill frontage is of particular architectural significance with decorative galleries set within three block cores. The Ely Place frontage is notably much simpler with no particular decorative features of note.

1.6. This report has been produced to inform the full planning and listed building application, and focuses on the significance of the heritage assets potentially affected by the proposals, and the impact of the proposals upon that significance. The site is identified on the map below.

Heritage Asset Map (Application Site in Red Outline)

Source: Historic England

St Andrew's House Frontage 2021

Source: Heritage Potential

St Andrew's House Frontage 1943

Source: Historic England

2. Planning History

2.1. The following historic applications are considered to be relevant to the proposals.

Reference	Description	Decision
2007/3901/P & 2007/3897/L	St Andrews House 140 Saffron Hill London EC1N 8QNAmendments of listed building consent dated 5th April 2006 (ref 2005/5430/L) for internal and external alterations/works associated with the conversion of the building, involving alterations to existing windows, proposed location of new satellite dish and aerial at roof level, alterations to plant rooms at rear and roof level, new balcony rail on west (rear) elevation, proposed iron, brickwork and masonry cleaning, painted render and omission of awnings at roof level to St Andrews House.	Application Approved 23-08-2007
2005/5428/P & 2005/5430/L	St Andrews House 140 Saffron Hill London EC1N 8QNConversion of the building involving the creation of 8 additional self contained units at ground and first floor levels, new canopies at roof level, installation of plant/machinery in roof enclosures and at ground floor level to the rear of the building, new lift overrun at roof level, insertion of new windows and doors, erection of new balconies to the rear at first floor level and the installation of new roof railings.	Application Approved 09-01-2006
1215E	11-25 Charterhouse Street 1-7 Farringdon Road 141-152 Saffron Hill and Viaduct Buildings: The erection of:- (a) A 14 storey building for use as offices plant and workshops in connection with the diamond industry and two levels of basements for use as recreation, plant rooms, sawing factory, parking and canteen. (b) A part four and part six storey building for use as offices in connection with diamond trading. (c) A single storey building with 2 basement levels for use as a public cinemas, and the retention of Affil House Viaduct Buildings, for residential use as a students hostel, and the provision of basement parking.	Application Approved 29-10-1973
4328	Construction of additional storey over part of premises, as common rooms to serve student occupation of flats.	Application Approved 19-10-1967
	Conversion of existing air raid shelter to transformer sub-station.	
841	The redevelopment of the site of Viaduct Buildings, Saffron Hill, Camden, by the erection of a showroom building.	Application Refused 15-11-1965

2.2. The above applications are most relevant as they have been made, and approved, under the context of St Andrew's House as a listed building, following the statutory designation in 1999.

2.3. Prior to listing, it is recorded that the viaduct buildings, as St Andrew's House was known at the time, were approved for temporary use as showrooms on 16/11/1965.

2.4. Records show that the roof extension was added following approval in 1967, under application reference 4328. It is evident that the internal configuration of the building was reworked at the same time with a number of partitions added.

2.5. Applications were submitted and approved in the 1970s for redevelopment of the land around St Andrew's House however the works to St Andrew's House appear to largely relate to its retention.

Pre-Application Request Reference: 2021/1357/NEW

2.6. A pre-application advice request was submitted to LB Camden on 17 March 2021. The initial proposals allowed for the extension of the existing risers at the rear of property to be utilised and extended to hold the new plant kit.

Initial Pre-Application Design

EXISTING REAR FACADE

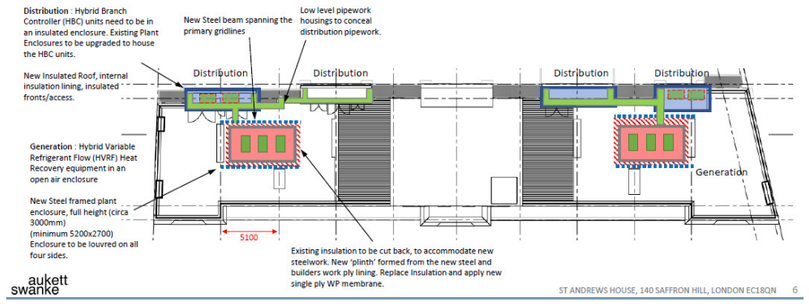
PROPOSED REAR FACADE

Source: Aukett Swanke

2.7. Following discussions with the conservation officer, feedback consisted of concern regarding the size and location of extending the risers to the rear of the building. It was considered by officers that extending at the edge of the roof was inappropriate and the applicant was advised to look at options to locate the plant centrally on the roof.

2.8. Following a study of the structural implications, additional options were discussed and Option C2 was identified as the preferred option by officers, allowing for 2 no. plant enclosures located centrally on the roof, to either side of the existing roof addition.

Option C2 (Officers Preferred Option)



Source: Aukett Swanke

2.9. On 11/06/2021, informal written feedback was received confirming the following:

- Due to the location and nature of the revised proposals and following the relocation of the plant so that it is now set back from the building edge, the development is not considered to impact neighbouring amenity by way of a loss of outlook, daylight or sunlight.
- The development is aiming to work towards zero carbon by removing gas fired equipment and providing an all-electric suite of air source equipment which is welcomed.
- Local Plan Policy CC2 discourages active cooling (air conditioning). Air conditioning will only be permitted where thermal modelling demonstrates a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy.
  - Passive measures should be considered first. If active cooling is unavoidable, applicants need to identify the cooling requirement and provide details of the efficiency of the system.

2.10. The proposals have been progressed in line with the officer preference expressed within the pre-application process.

3. Legislation, Policy and Guidance

Heritage Legislation

3.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislation and foundation on which further policy, and guidance relating to the conservation of the historic environment is built. Section 66 of the Act relates to the 'general duty as respects listed buildings in exercise of planning functions', with Section 66 (1) stating that when deciding whether to grant planning permission for a development, special regard must be given by the local authority to the "desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".

3.2. Section 66 (2) of the Act states that "a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings".

3.3. Section 72 of the Act relates to the 'general duty as respects conservation areas in exercise of planning functions', with Section 72 (1) of the Act stating that in exercising planning functions, "special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area".

NPPF: Heritage (2019)

3.4. The National Planning Policy Framework, with which all Local Development Plans must comply, constitutes the national level of planning policy and is a material consideration in planning decisions. The NPPF was originally introduced in March 2012 and was subsequently updated and published on 24 July 2018. The 2018 update broadly retains the wording of the 2012 Chapter on Conserving and Enhancing the Historic Environment (Chapter 16). The NPPF was recently updated again (February 2019) in order to provide definitions for housing need. No paragraph numbers changed as a result of this update.

3.5. The NPPF represents a continuation of the philosophy contained within Planning Policy Statement 5 (PPS5), introduced in 2010 and one of a number of planning policy documents replaced by the NPPF in 2012.

3.6. The NPPF uses slightly different terminology to the Act and emphasises that 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".

3.7. 'Conservation' is defined within the NPPF as "the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance".

3.8. No definition of 'preservation' (or any variant) is contained within the document. However, Historic England advise that both 'conservation' and 'preservation' are concerned with the management of change which seeks to sustain the special interest or significance of heritage assets. 'Conservation' has the addition of taking opportunities to enhance significance where it is possible and considered to be appropriate. This is discussed in Historic England's 2018 publication *Decisions: Legal Requirements for Listed Building and Other Consents*.

3.9. The NPPF also helps to define other key terms within heritage policy. These are provided within the table below.

Term	Definition
Heritage Assets	"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)." (p.67)
Designated Heritage Assets	"A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation." (p.66)
Significance	"The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting." (p.71)
Setting of a Heritage Asset	"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral." (p.71)

3.10. Chapter 16 specifically relates to conserving and enhancing the historic environment (paras. 184-202).

3.11. Paragraph 189 stipulates that within applications, applicants are required to describe the significance of the heritage assets affected and the contribution made by their setting. Local authorities should also identify and assess the significance of the heritage assets affected by a proposal. This should be taken into account when assessing the impact of a proposals on a heritage asset (Paragraph 190). Paragraph 192 of the NPPF goes on to state that when 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. (p.55)

3.12. Paragraphs 193-202 of the document discuss how potential impacts to heritage assets should be considered with paragraph 193 stipulating a requirement for great weight to be given to an asset's conservation when considering the impact of a proposed development on its significance. The weight given should reflect the importance of the asset (p.55).

NPPF Degrees of Harm

3.13. Where harm to the significance of a designated heritage asset is identified, the NPPF requires clear and convincing justification of the proposals. The document categorises levels of harm as: total loss; substantial harm; and less than substantial harm.

3.14. Paragraph 195 states that where a development would lead to substantial harm to (or total loss of) the significance of a designated asset, local planning authorities should refuse consent, unless it can be demonstrated that such harm is necessary to achieve substantial public benefits that outweigh that harm, 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.

3.15. Paragraph 196 states that where a proposed development will lead to less than substantial harm to the significance of a designated asset, this should be weighed against the public benefits of the proposal, including securing its optimum viable use.

3.16. In the case of impact on non-designated heritage assets, Paragraph 197 states that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Camden Planning Policy

<u>Local Plan (2017)</u>

3.17. Policy A1 (Managing the Impact of Development) states that the Council will seek to protect the quality of life of occupiers and neighbours and will grant planning permission for development unless this causes unacceptable harm to amenity. They will:

a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;

b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;

c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and

d. require mitigation measures where necessary.

3.18. The factors we will consider include:

e. visual privacy, outlook;

j. noise and vibration levels.

3.19. Policy A4 (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is controlled and managed.

3.20. Development should have regard to Camden's Noise and Vibration Thresholds (Appendix 3). We will not grant planning permission for:

a. development likely to generate unacceptable noise and vibration impacts; or

b. development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

3.21. We will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. We will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

3.22. Policy D1 (Design) states that the Council will seek to secure high quality design in development. The Council will require that development:

a. respects local context and character;

b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;

c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

d. is of sustainable and durable construction and adaptable to different activities and land uses;

e. comprises details and materials that are of high quality and complement the local character;

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

g. is inclusive and accessible for all;

h. promotes health;

i. is secure and designed to minimise crime and antisocial behaviour;

j. responds to natural features and preserves gardens and other open space;

k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,

l. incorporates outdoor amenity space;

m. preserves strategic and local views;

n. for housing, provides a high standard of accommodation; and

o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

3.23. Policy D2 (Heritage) states that 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.

3.24. As per national policy, 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.

3.25. Policy CC2 (Adapting to Climate Change) states that the Council will require development to be resilient to climate change.

3.26. All development should adopt appropriate climate change adaptation measures such as: a. the protection of existing green spaces and promoting new appropriate green infrastructure.

Draft Belgravia Conservation Area Audit SPG (2013)

3.27. The Draft Belgravia Conservation Area Audit SPG describes the townscape character of the Belgravia Conservation Area, describing the history and key features of the area and what makes it significant.

London Plan (2021)

3.28. The London Plan seeks to lead the way in tackling climate change by moving towards a zero carbon city by 2050.

3.29. Policy GG6 (Increasing Efficiency and Resilience) states that to help London become a more efficient and resilient city, those involved in planning and development must:

A seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zerocarbon city by 2050

B ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect

C create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism

D take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

3.30. Policy HC1 (Heritage Conservation and Growth) states that:

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.

National Planning Practice Guidance

3.31. The NPPG offers guidance as to what public benefits may constitute and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits may include heritage benefits, such as:

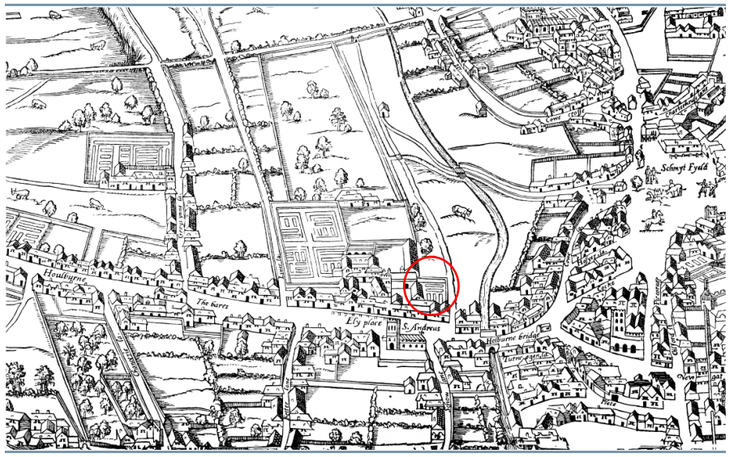
- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long-term conservation

4. Heritage Significance of Hatton Garden Conservation Area

4.1. The Hatton Garden Conservation Area was designated in 1999 although the importance of the area was first acknowledged in the 1976 Greater London Development Plan as part of the 'Royal Courts of Justice, Inns of Court Area of Special Significance'. The Hatton Garden area has a long history dating back to medieval period, which has had a direct impact on the topography and plan of the streets in this part of London.

4.2. The route known as Holborn is a Roman road, although the area was largely uninhabited at that time. During the medieval period, the area developed with large courtyard houses built by the wealthy. Ely House, the London residence of the Bishops of Ely was built circa 1286 and its chapel survives today as the church of St Etheldreda, Ely Place, and is Grade I listed.

The Agas Map c.1558 (Approx. Location of App Site Circled)

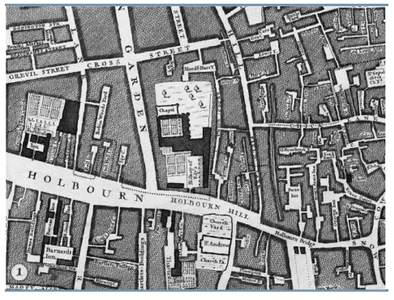


Source: Map of London

4.3. The curvature of Saffron Hill derives from the medieval plan of the area and history of Field Lane, which runs north to south to the right hand side of the red circle on the map above.

4.4. The first formal urban development in the area was seen in 1654 when the land around Ely House was laid out with a regular grid of streets centred on Hatton Garden. Courtyards were provided for stabling, including what is now Bleeding Heart Yard, directly to the north of St Andrew's House.

Rocque Map 1746



Source: Locating London

Ely House c.1722

Source: Picturesque Antiquities of the English Cities, 1828

4.5. Rocque's Map of 1746 shows a network of small courts and alleys to the north of Saffron Hill. The dense street pattern is noted and the image of Field Lane from the 1850s, below, demonstrates the narrow and busy streets.

Field Lane Looking North c. 1850 by T.H. Shepherd

Source: British Museum

4.6. The orientation of Charterhouse Street and its steps down to Saffron Hill are the result of a major Victorian infrastructure project. The slums around the River Fleet were cleared to create Farringdon Street (now Farringdon Road) in 1841-56 (the River was culverted under the road). This was the beginning of a series of interlinked projects that continued into the 1890s. The slums were cleared to improve transport links by road and rail, in connection with the rebuilt Smithfield Market.

4.7. Charterhouse Street was built between 1869 and 1875 as a route to the new Smithfield Market, built in 1866. The new road network was built at a higher level in order to bridge the hilly topography of the river valley. As a result, Charterhouse Street was given a flight of steps down to Saffron Hill, which was cut off at that point (it had formerly continued southward). Further steps were provided in the courts leading up to St Andrew's House, which, owing to the valley topography, was built higher than Saffron Hill yet below the level of Charterhouse Street.

OS Map 1873

Source: NLS

4.8. OS Mapping from 1873, prior to St Andrew's House being built, and 1896 with St Andrew's House well established are shown above and below respectively.

OS Map 1896

Source: NLS

4.9. The area experienced a significant level of bomb damage during the second world war which led to the loss of a number of historic buildings. The image below, from 1944 shows the surviving Grade II listed 21 Ely Place adjacent to a bomb damaged terrace.

21 Ely Place 1944

Source: Metropolitan Archives

Character

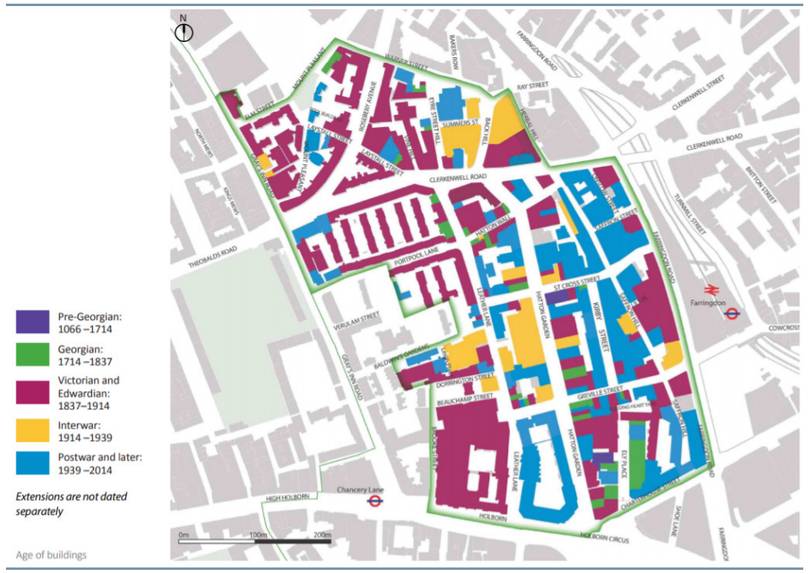
4.10. The Hatton Garden Conservation Area contains a mix of historic and modern buildings. As an important commercial centre in the heart of London, modern office development has grown and largely dominates the character and appearance of the area. Mixed into this more modern aesthetic are the narrow streets and courtyards discussed within this section.

4.11. Rooftop plant, an essential feature of modern development, is somewhat dominant within the conservation area and has been disguised to varying success. The rooftop plant to the new De Beers offices, adjacent, has a bronze louvered effect which is superior to less sympathetic alternatives nearby.

4.12. A number of other listed buildings can be found within close proximity to St Andrew's House, predominantly along Ely Place. These include:

- 26-34 Ely Place – Georgian terraces built in 1773 on the site of Ely House
- 21 & 25 Ely Place – Georgian terraces to either side of rebuilt 20th Century buildings following bomb damage.

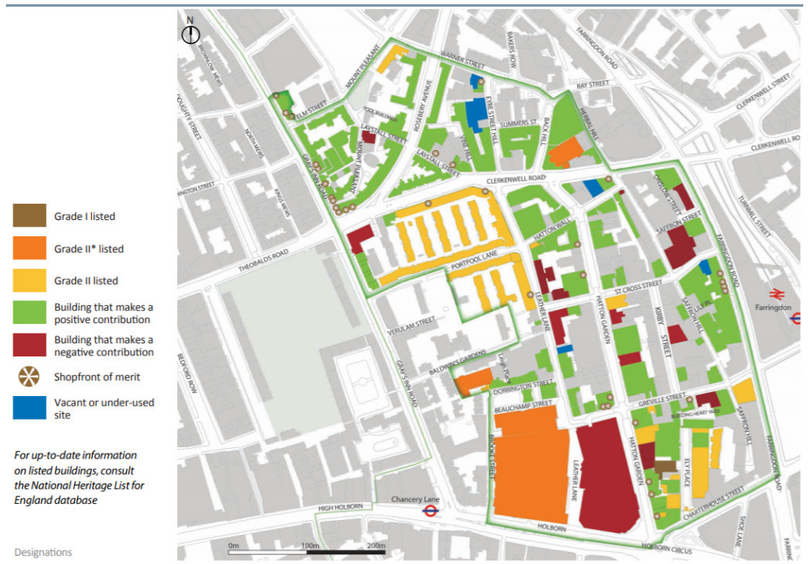
Age of Buildings



Source: LB Camden

4.13. The map below identifies those buildings that are listed, have a positive impact on the conservation area and those that have a negative impact.

Building Designations



Source: LB Camden

Significance

4.14. It is clear that the conservation area takes it primary significance from its medieval history, the legibility of the street pattern, and tight nit character of its lanes and alleys.

Architectural Interest

4.15. The conservation area has a high level of architectural significance deriving from the form and features found within it, primarily, although by no means limited to, on front elevations.

4.16. There are also a number of modern developments within the conservation area which relate to the historic environment with a varying amount of success.

Historic Interest

4.17. The conservation area has historic significance deriving from its medieval origins and significant development within the 19th century.

Archaeological Interest

4.18. The site is located within an Archaeological Priority Area and has potential archaeological interest.

Artistic Interest

4.19. The conservation area has limited artistic interest.

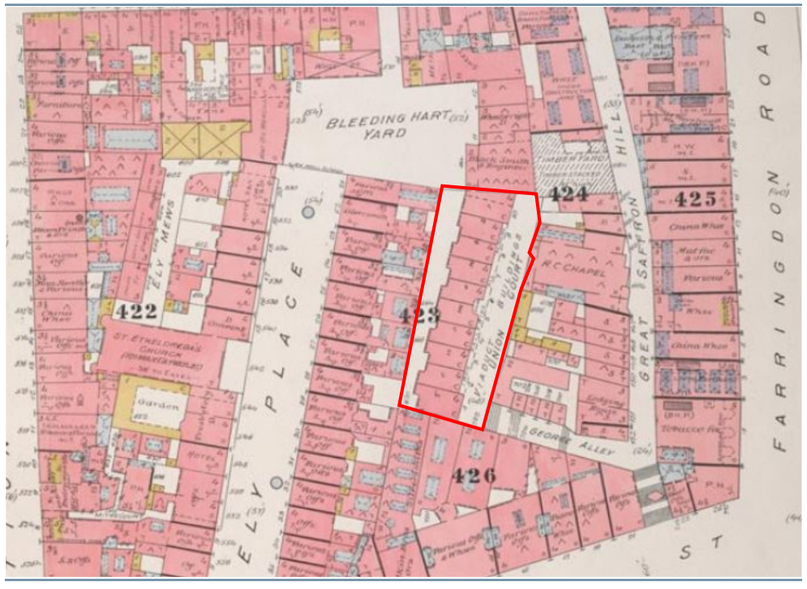
5. Significance of St Andrew's House

5.1. St Andrew's House is a Grade II listed property, listed on 08 March 1999 and described in the listing as:

> *Nineteen flats, some now in office use. Built in 1875 by Corporation of the City of London, architect Horace Jones. Stock brick with some rendered details, flat roof. Symmetrical plan of four storeys with attic over centrepiece. One-bay centrepiece and two-bay end wings, with between them on each side and each floor six bays set behind galleries of cast-iron with exposed four-centred beams. All windows with glazing-bar sashes, those to centre and ends in stucco surrounds. The badge of the Corporation on the end wings.*
>
> *INTERIORS: altered and a lift inserted.*
>
> *HISTORICAL NOTE: this block, originally known as Viaduct Buildings, is the oldest surviving public housing in London and one of the oldest in Britain. This is the survivor of two blocks built by the Corporation, whose design owes much to Sydney Waterlow's model dwellings for the Improved Industrial Dwellings Company. This design is more lavish than was generally adopted by the IIDC, particularly in its use of cast-iron. Waterlow was a member of the City's Common Council and the Inspiration behind this development.*

5.2. The earliest detailed map showing St Andrew's House is the 1886 GOAD Map. At this time, the building was known as "Viaduct buildings" and faced onto Union Court with steps, known as George Alley, down to Saffron Hill.

1886 GOAD Plan Showing Viaduct Buildings Within Union Court



Source: Metropolitan Archives

5.3. The earliest images of St Andrew's House show a continuous gallery to the frontage with stair cores to either end. Protruding chimney stacks are evident on the rooftop.

St Andrew's House, 1943

Source: Historic England

5.4. Images from 1976 show a fairly familiar appearance albeit with the addition of the 1967 roof extension placed centrally on the roof of the building. These images were all taken from George Alley, which has since been redeveloped.

St Andrew's House 1976

Source: Metropolitan Archives

St Andrew's House 1976

Source: Metropolitan Archives

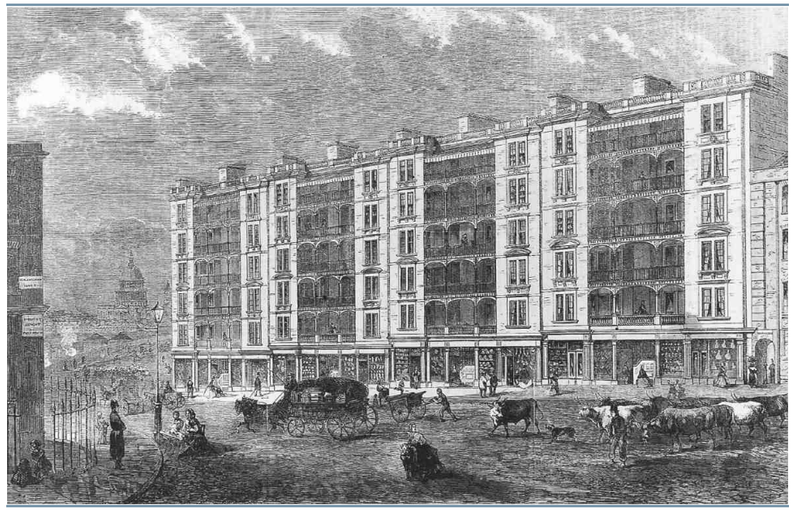
St Andrew's House 1976

Source: Metropolitan Archives

5.5. St Andrew's House was built in 1975 by the City of London as 'industrial dwellings', otherwise known as low rent housing for artisans. The design of the building is similar to the earlier Corporate Buildings on Farringdon Road, which dated to 1865 but were demolished in 1970.

5.6. The architect for both buildings was City Architect Sir Horace Jones who borrowed ideas from private blocks built by the Improved Industrial Dwellings Company. The City of London thus became the first local authority to build social housing.

Corporation Buildings, Farringdon Road, 1865 (Demolished 1970)



Source: British-history.ac.uk

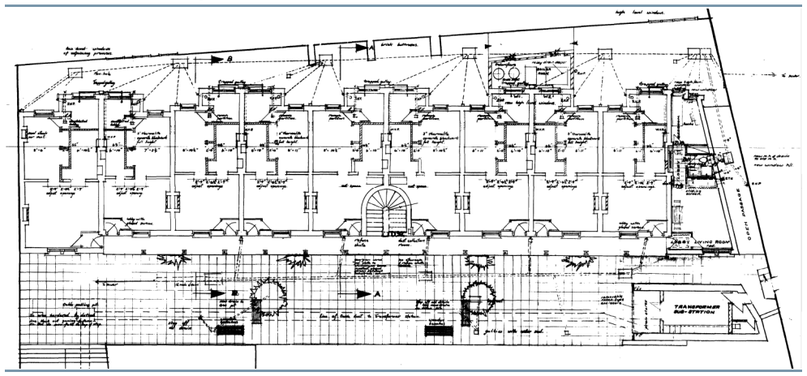
5.7. St Andrew's House, built in 1874, is considered to be the oldest surviving examples of public housing in London, and some of the oldest in England.

Internal Significance

5.8. St Andrew's House was listed in 1999 with the listing acknowledging that the interior of the building had been 'altered with lift added'. Whilst this in itself would not necessarily mean that the interior of the building holds no historic or architectural significance, it is evident that the interior has been gutted and left with a simple, plain, white painted interior. Modern kitchen and bathroom facilities, partitions and fitted cupboards have been added to facilitate use as residential flats following a history of varying uses from showrooms to student housing and office use.

5.9. As such, there are no surviving features relating to the original interior of the flats. The general plan form has; however, survived, and it is this that holds the most significance internally. As such, proposals would be expected to take care of retaining this significance and seek to minimise interruption through historic fabric. The ground floor layout from 1967, shown below, demonstrates the level of change within each flat compared with what can be seen today.

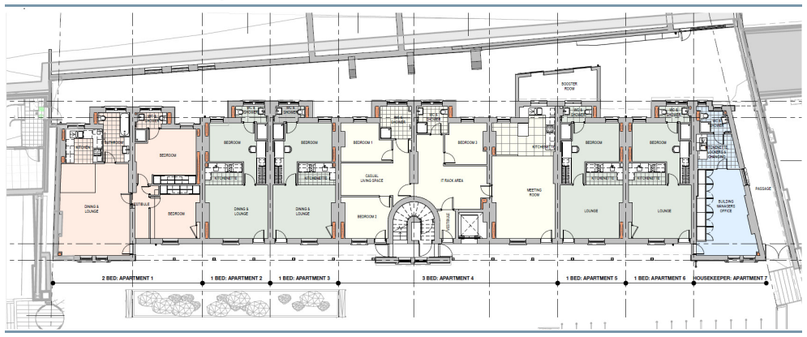
1967 Ground Floor Layout



Source: LB Camden

5.10. The existing service risers are located towards the rear of the building and utilise modern boxed out facilities within the bathrooms.

Current Ground Floor Layout



Source: LB Camden

Significance

Architectural Interest

5.11. St Andrew's House has a high level of architectural significance and was designed vertically within a crowded courtyard setting. The detailed gallery, with railings, is of high quality and creates an impressive façade. The roof of the building has been adapted with a 1960s/70s roof addition and the loss of its chimneys later in the 20th Century, presumably when the building went from coal power to gas.

5.12. The rear of building has been adapted with ground floor doors replaced with windows, as evidenced by the differences in the brickwork. The interior of the building has been much altered and there is no significance to the individual flat layouts and fixtures. The general plan form of the building, as a whole, however has been retained and significance can be found in that regard.

Historic Interest

5.13. St Andrew's House has a high level of historic significance as an early example of local authority flats. Its association with the City Architect Horace Jones, well known for Tower Bridge, amongst many other famous landmarks, also adds to its historic interest.

Archaeological Interest

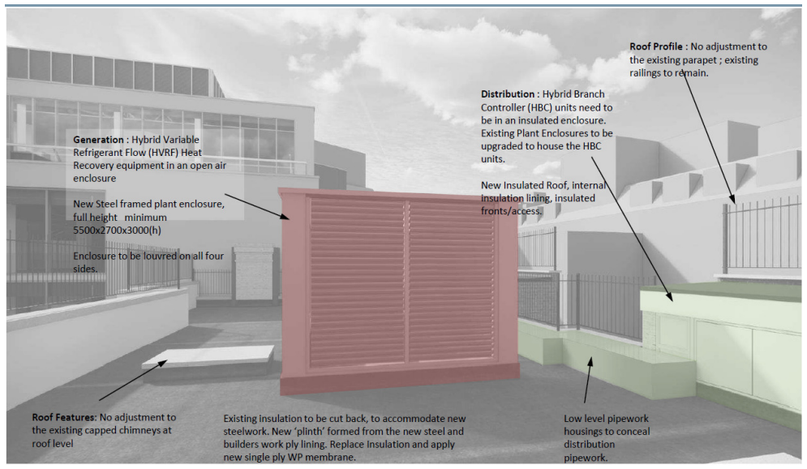
5.14. The site is located within an Archaeological Priority Area and has potential archaeological interest.

Artistic Interest

5.15. The property has limited artistic interest.

6. Proposals

Roof View



Source: Aukett Swanke

Roof Plant

- Existing Plant Enclosures to be upgraded to house the HBC units.
- New Insulated Roof, internal insulation lining, insulated fronts/access.
- New Steel framed plant enclosure, full height (circa 3000mm).
- New Steel beam spanning the primary gridlines.
- Low level pipework housings to conceal distribution pipework.
- Existing insulation to be cut back, to accommodate new steelwork. New 'plinth' formed from the new steel and builders work ply lining. Replace Insulation and apply new single ply WP membrane.
- Existing routes to be utilised and current modern boxing out extended in bathrooms.

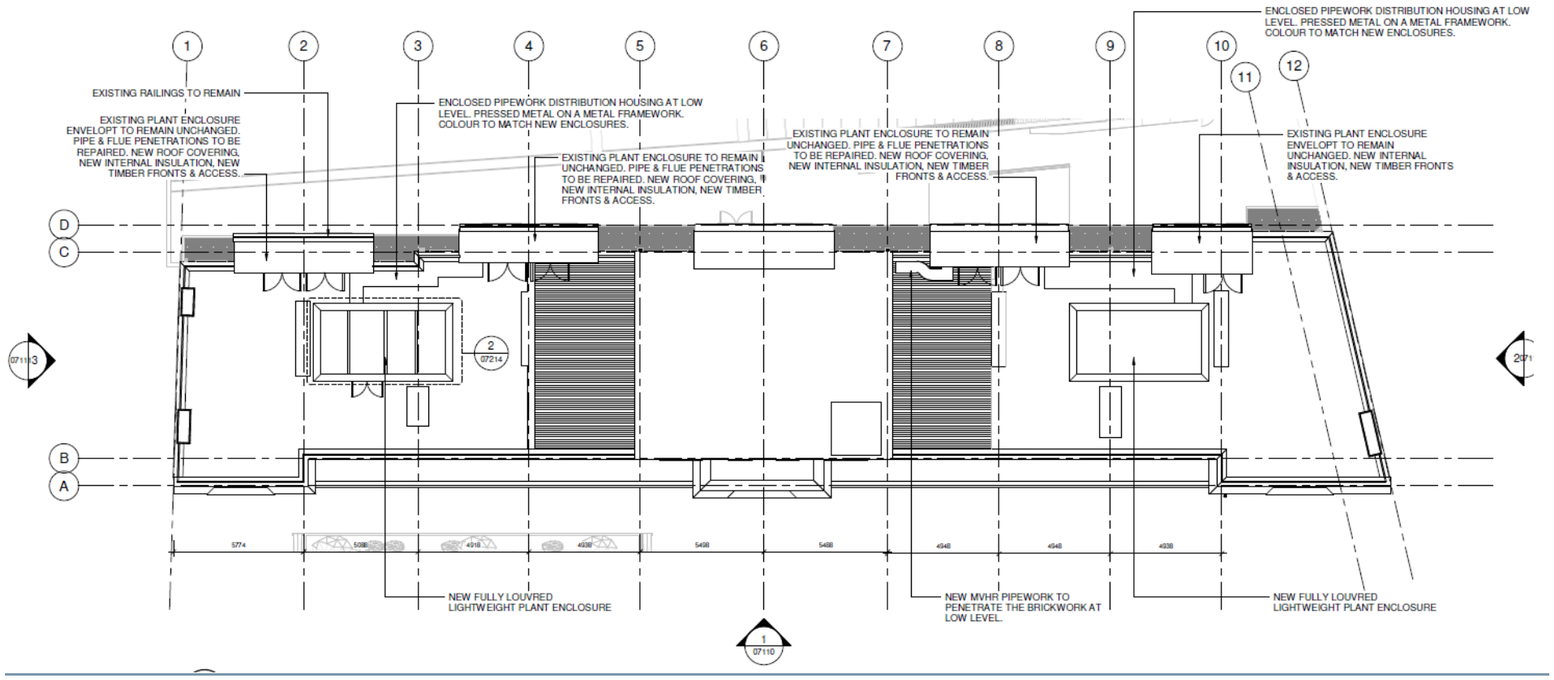
Elevation Works

- Cast iron air bricks to replace existing terracotta (36).
- New cast iron air bricks (42).
- Existing rear window to be replaced with door.
- Replaced timber glazing to 4th floor addition.

Internal Works

- New dropped ceiling and extended boxing out behind toilets for pipework.
- New Plant Room to Apartment 4.
- Secondary glazing.

Plan View

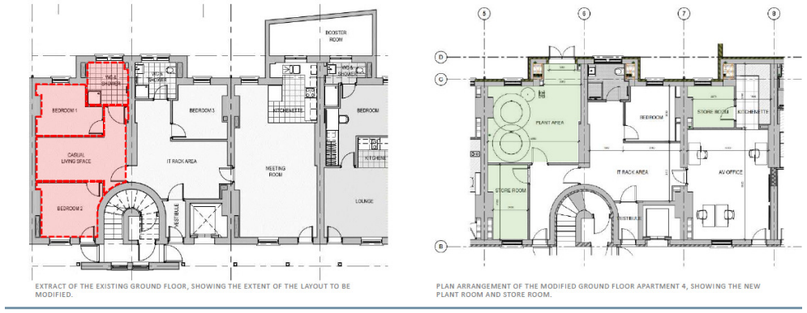


Source: Aukett Swanke

View from Sloped Access Via Saffron Hill and View of Roof

Source: Aukett Swanke

Existing and Proposed Plant Room (Apartment 4)



Source: Aukett Swanke

7. Planning and Heritage Assessment and Impact of Proposals

7.1. The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework is a material consideration in planning decisions. It also provides guidance on how to draw up Development Plans and policies.

National Planning Policy

- National Planning Policy Framework (NPPF) (February 2019);
- National Planning Policy Guidance (NPPG) (March 2014).

Development Plan Policies

7.2. The application proposal is required to be assessed against the adopted Development Plan for London Borough Camden, which comprises the following documents:

- London Plan (2021);
- Camden Local Plan (2017).

7.3. A summary of the relevant planning policies is contained in **Section 3** of this Statement.

Main Considerations

7.4. The main considerations when assessing this application are the following and they are discussed in turn below:

- Impact on the significance of the listed building and conservation area.
- The sustainability benefits of the proposals, including steps towards zero-carbon.

7.5. These matters are assessed against the relevant national and local planning policies within this section and it is concluded that the sustainability benefits, moving away from highly inefficient gas power to green technology would outweigh a low level of less than substantial harm to the significance of the listed building and conservation area.

7.6. The proposals would result in a 62% fall in co2 emissions, substantially improving the building's performance and sustainability. This would constitute a significant leap towards becoming carbon zero, the ambition set by Camden for 2030, and an ethos shared by the applicant. It would immediately achieve the 2008 Climate Change Act ambition of a reduction of 50% by 2025 (as set by the budget).

Principle of the Works

7.7. The proposals seek to improve the energy performance of the building, moving away from inefficient gas power and towards more sustainable energy via air source heat pump technology. LB Camden declared a climate emergency in 2020 and a commitment to do "everything we could to make Camden a zero carbon borough by 2030". Similarly, Policy GG6 of the London Plan (2021) requires that:

> *"those involved in planning and development must A) seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050."*

7.8. The proposals represent a developer lead push towards achieving these nationwide, London wide and Camden specific goals.

7.9. The submitted energy Assessment states that the proposals will improve the energy performance of the building by saving 127 tonnes of carbon each year, a fall of 62%. In light of the climate emergency, this is undoubtedly a considerable public benefit.

7.10. It is acknowledged that Policy CC2 of the Camden Local Plan seeks to resist air conditioning; however, given the context of the building, set within a high-density urban environment with minimum air movement to contribute to the benefits of natural ventilation, and with the heat island effect radiating heat throughout the night time hours, the building fails to meet Criterion B of the CIBSE TM59 methodology. The submitted Energy and Overheating Assessment recommends active cooling for the comfort of those staying at the property.

Impact of the Works on Heritage Assets

7.11. It has been demonstrated that St Andrew's House has historically seen chimneys protrude skywards at intervals across the roof. These chimneys, of which only a small section survives to each, relate to the historic coal based heating network throughout the building. The building has since moved to unsustainable gas energy resulting in plant areas being added to the rear of the roof. A story is told on the roof of the building and it is considered that reutilisation of the current plant areas and incorporation of new louvred plant area for a sustainable future simply continues the story of the building's evolving energy requirements. Significantly, in this instance, the proposed energy upgrade will see the building contribute to local and national targets of zero carbon and a sustainable future.

7.12. It is considered that the utilisation of existing plant locations with additional bulk requirements located in the location of historic chimneys represents an appropriate design solution that will have a generally minor impact on the significance of the building given the history of plant bulk and severely limited views of the roof.

7.13. In terms of materials, the plant enclosures are proposed to consist of a louvred steel frame, in light grey. It has been demonstrated that the plant additions will only be visible from the upper floors of the immediately adjacent buildings with no views from street level.

7.14. To the rear of the building, the newly proposed door, to replace an existing window, will allow access to the proposed plant room. It is evident from the change in brick that a door was once found in this location and so the proposals are not considered to be harmful to the significance of the building.

7.15. The existing air bricks are understood to be later additions and do not sit neatly within the façade, with variations in heights and finish. The proposals would allow for the replacement of the existing 32 air bricks with cast iron air bricks. An additional 42 cast iron air bricks are proposed to sit symmetrically with the existing.

Air Brick Proposals

Source: Aukett Swanke

7.16. The proposed works to the existing roof extension are like for like and will maintain the condition and upkeep of the building.

7.17. The internal plant requirements utilise existing routes and will impact only modern boxing out.

Internal Works

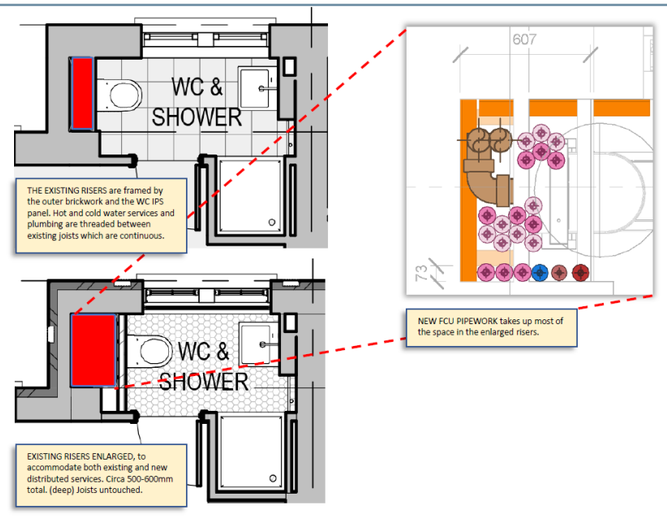
7.18. The interior of the building is plain, and the result of modern refurbishment works. The previous sections have demonstrated that the partitions found in the 1960s have been removed and new partitions now break up each apartment. All fixtures and fittings are modern.

7.19. The proposals allow for inclusion of dropped ceilings and bulkheads in areas to hide plant equipment. The works would be designed to match the existing finish and would be suitably subtle.

7.20. This is a reasonable alteration within listed buildings and the nature of the works ensures minimal interruption to historic fabric.

7.21. It is also proposed to lift a number of the floors to provide access to the pipework running within the joist zone. These works are necessary to replace the plumbing fittings and pipework. Crucially, no modifications to the floor joists are proposed and all new pipework will utilise existing servicing routes.

Existing and Proposed Risers



Source: Aukett Swanke

7.22. The existing risers through the building utilise the space behind the toilets and are modern partitions. The proposals require a larger space for risers to be accommodated and it is considered that the lowest impact solution is to simply extend the existing modern partitions to accommodate this.

7.23. No structural alterations are required, and the existing floor joists are already trimmed to accommodate the risers.

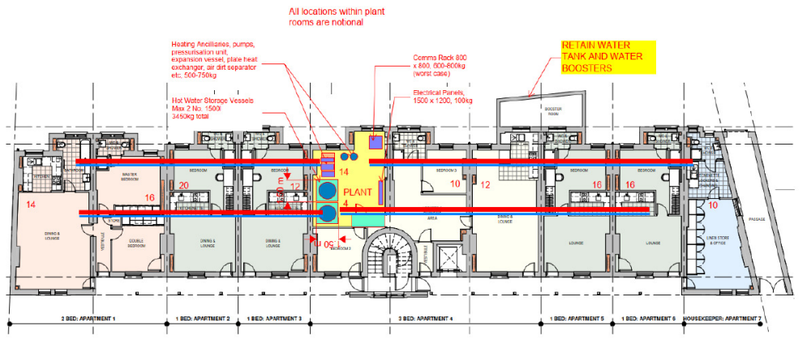
7.24. To facilitate distribution of the pipework from the new plant room on Ground Floor to the existing risers, new builders work slots are proposed at high level at GF, through the

existing brick apartment divisions. From there the pipework will branch in the ceiling zone to each of the risers, to serve each level as they do at present.

7.25. It is considered that the works required to achieve the sustainability benefits are minor with just a small minor works required and the ability to reuse existing service routes favourable.

7.26. The proposed secondary glazing will sit away from the existing windows and is the Historic England favoured solution to improving energy performance and noise conditions.

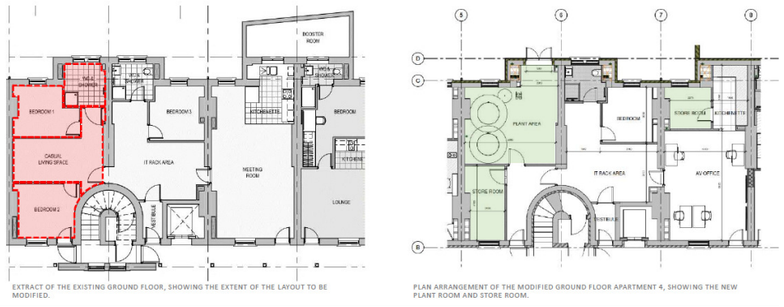
Plant Room and Distribution



Source: Aukett Swanke

7.27. Apartment 4 is proposed to be utilised as the new plant room and the removal of modern partitions is required to allow this to happen.

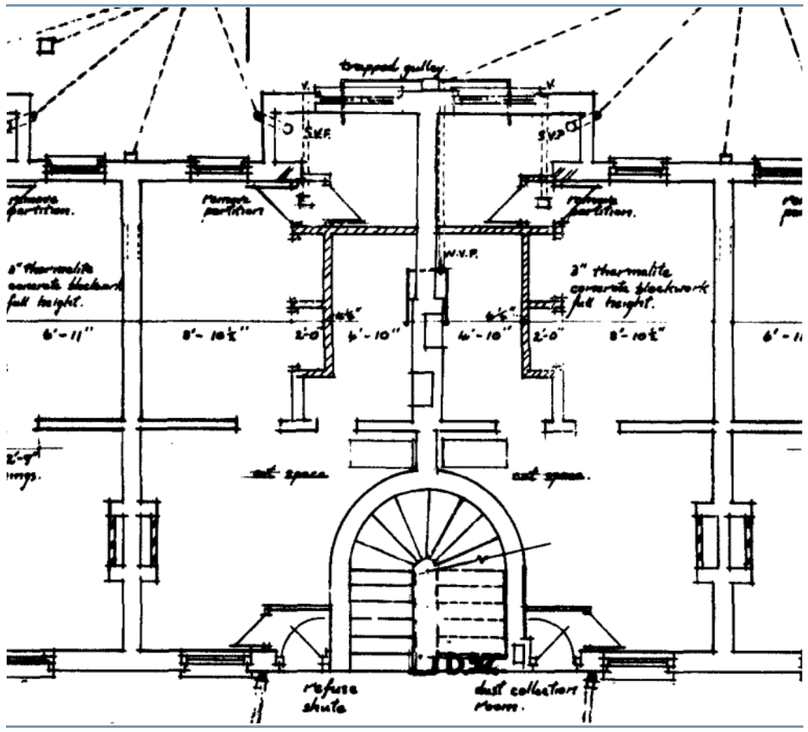
Existing and Proposed Plant Room (Apartment 4)



Source: Aukett Swanke

7.28. As demonstrated below, the proposals would actually reinstate subdivision evident from 1967 plans in the room. Whilst it cannot be said for certain that this is the original line, a strong assumption can be made given the alignment with adjacent units.

1967 Layout to Apartment 4



Source: LB Camden

Assessment of Impact

7.29. Overall, it is considered that the addition of two plant enclosures on the roof of the listing building will inevitably have some impact on the significance of the building. Given the history of chimney stacks, enclosures protruding into the sky are not an alien feature on the building, albeit the design and appearance are notably different between then and now. It is considered that the proposed additions would have a low level of less than substantial harm.

7.30. The remainder of the proposals are considered to be negligible, at worst. New air bricks will replace later additions, with some new bricks required. These have been designed to sit symmetrically and would have a minimal impact.

7.31. The proposed plant room would reinstate the historic subdivision and the proposed door would be in the location of an historic door opening. No harm is considered to result from this aspect of the proposals.

7.32. The internal works will not affect the character of the listed building and predominantly utilise existing service routes or require reversible bulkheads.

7.33. The overall low level of less than substantial harm is considered to be substantially outweighed by the 127 tonnes of Co2 saved per annum (62%) and steps taken towards achieving the London Plan and Camden ambitions of zero carbon by 2050 and 2030, respectively. Given the status of the building, it is considered that the proposals are sensitive, and that the developer led sustainability project should be openly welcomed.

7.34. In light of the substantial public benefits, Paragraph 196 of the NPPF is considered to be satisfied. Policy CC2 is considered to be satisfied and the ambitions of the London Plan and LB Camden positively contributed towards.

8. Summary

8.1. Overall, it is considered that the works required in order to significantly improve the energy performance of the building, bringing into the 21st century and towards a zero carbon future have been designed in a sympathetic manner and benefit from the ability to reutilise existing servicing routes for minimal impact on historic fabric.

8.2. This Planning and Heritage Statement demonstrates that the proposals will help to meet local and national sustainability targets, allowing for a 62% carbon saving, whilst minimising harm.

8.3. It is considered that the substantial public benefit of improving the sustainability of the building in a sensitive manner significantly outweighs the low level of less than substantial harm to the affect heritage asset. The proposals are thereby compliant with Paragraph 196 of the NPPF.