

NOS. 1 - 32 BROOKES COURT
LONDON EC1

**HERITAGE
ASSESSMENT**

6 MAY 2022

GJHP

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1 INTRODUCTION

- 1.1 This Heritage Assessment has been prepared by GJHP in support of the preapplication submission for alterations to improve energy efficiency (the ‘Proposals’) at nos. 1 – 32 Brookes Court, London EC1 in the London Borough of Camden. GJHP is a consultancy that provides expert advice on heritage and townscape matters.
- 1.2 The assessment considers the effect of the proposals (the ‘Proposals’) on the heritage significance of heritage assets in the area around the Site.
- 1.3 The report sets out the following:
- Relevant statutory duties and national and local policy and guidance;
 - A description of the Site and its heritage context;
 - Statements of significance of the relevant heritage assets; and
 - An assessment of the Proposals and their effect on heritage significance in light of the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and national and local policy and guidance.
- 1.4 The report should be read in conjunction with the covering letter and preapplication pack prepared by Bailey Garner.

2 LEGISLATION, POLICY & GUIDANCE

- 2.1 This section sets out the relevant statutory duties and national and local planning policies and guidance that are relevant to the consideration of heritage matters.

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

Listed buildings

- 2.2 Section 66 (1) of the Act states, *‘in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’*

National planning policy

The National Planning Policy Framework, 2021

- 2.3 The Government issued the updated National Planning Policy Framework (NPPF) on 20 July 2021. The NPPF sets out planning policies for England and how these are expected to be applied.

Heritage

- 2.4 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.
- 2.5 Heritage assets are defined in Annex 2 of the NPPF as a *‘building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).’*
- 2.6 The NPPF notes, at paragraph 189, that heritage assets *‘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.’*

- 2.7 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 194). It goes on to say that *'the level of detail should be proportionate to the heritage assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*
- 2.8 The NPPF identifies three key factors local authorities should take into account in determining applications:
- 2.9 *'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.'*
- 2.10 Paragraph 199 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that heritage significance can be harmed or lost through alteration or destruction of the heritage asset or from development within its setting.
- 2.11 The setting of a heritage asset is defined in Annex 2 as *'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.'*
- 2.12 The NPPF states, at paragraph 201, that where a proposed development would lead to *'substantial harm'* or total loss of heritage significance of a designated heritage asset, consent should be refused, *'...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 a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.
- 2.13 Where a development proposal will lead to *'less than substantial'* harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 202).
- 2.14 Paragraph 203 states the effect of an application on the significance of a non-designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.
- 2.15 The NPPF requires local planning authorities to look for opportunities for new development within conservation areas and World Heritage Sites (WHSs) and

within the setting of heritage assets to enhance or better reveal their heritage significance. Paragraph 200 goes on to say *‘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’*.

- 2.16 Paragraph 207 states *‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance.’*

Planning Practice Guidance

- 2.17 The PPG includes a section called *‘Historic environment’* which was updated on 23 July 2019. It explains which bodies are responsible for the designation of HAs and provides information on heritage consent processes.
- 2.18 The PPG considers the factors that should inform decision taking about developments that would affect HAs. It notes that *‘HAs may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a HA, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals...’* (18a-007). It goes on to say *‘understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm’* (18a-008). It states that in assessing proposal, where harm is found, the extent of harm should be *‘clearly articulated’* as either *‘substantial’* or *‘less than substantial’* (18a-018).
- 2.19 The PPG notes that setting is defined in the NPPF and that *‘all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent’* (18a-013). It goes on to say, *‘the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each’* (18a-013).

Regional planning policy and guidance

The London Plan 2021

- 2.20 The London Plan 2021 was adopted in March 2021. It is the ‘overall strategic plan for London’ and sets out a ‘framework for the development of London over the next 20-25 years’.
- 2.21 Policy HC1 on ‘Heritage conservation and growth’ notes that development proposals that affect heritage assets and their settings should ‘conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings’.

Local policy and guidance

The Camden Local Plan (2017)

- 2.22 The Camden Local Plan was adopted on 3rd July 2017. It replaced the Core Strategy and the Development Policies. It covers the period up until 2031 and aims to help the delivery of the Council’s vision for Camden.
- 2.23 **Policy D1 Design** states the Council will seek to secure high quality design in development and sets out various requirements for new development including that it:
- ‘A respects local context and character;
B preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;...
E comprises details and materials that are of high quality and complement the local character.’
- 2.24 In considering local context and character it notes that all developments, including alterations and extensions to existing buildings, should be of the highest standard of design and take into account, amongst other things:
- ‘character, setting, context and the form and scale of neighbouring buildings; the character and proportions of the existing building, where alterations and extensions are proposed;
 - the prevailing pattern, density and scale of surrounding development;
 - the impact on existing rhythms, symmetries and uniformities in the townscape;
 - the composition of elevations;
 - the wider historic environment and buildings, spaces and features of local historic value.’

- 2.25 It goes on to say the Council will welcome high quality contemporary design which responds to its context, and that *‘good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings.’*
- 2.26 **Policy D2 Heritage** states 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. The policy is in line with the NPPF in respect of assessing harm to designated and non designated heritage assets.
- 2.27 It goes on to say that in order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas; and will:
- ‘E require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- F resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- H 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. ‘*
- 2.28 In respect of listed buildings, part K states that the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting.

Supplementary planning documents, guidance and other

Camden Planning Guidance – Design (2019)

- 2.29 The Camden Planning Guidance on Design (Design SPG) was published in March 2019 and supports the local plan. It gives information on detailed design issues, including design excellence and heritage, and supports policies D1 and D2 (amongst others) in the Camden Local Plan.

Hatton Gardens Conservation Area Statement

- 2.30 The Site adjoins the Hatton Gardens Conservation Area. The Hatton Gardens Conservation Area Statement (the ‘Appraisal’) was adopted in August 2017. It

describes the history, character and appearance or significance of the conservation area.

Bloomsbury Conservation Area Statement

- 2.31 The Bloomsbury Conservation Area lies to the west of the Site. The Bloomsbury Conservation Area Statement (the 'Appraisal') was adopted on 18 April 2011. It describes the history, character and appearance or significance of the conservation area.

Camden Planning Guidance Energy efficiency and adaptation January 2021

- 2.32 This guidance includes a section called 'What if a building is historic, listed or in a conservation area?' which notes:

'In order to identify the most appropriate measures, the Council recommends taking the following approach, which takes into account measures best suited to individual buildings and households (i.e. taking human behaviour into consideration as well).

A range of thermal efficiency measures can then be implemented, which avoid harm to the historic environment. Ranked according to their impact on heritage and the technical risks, these include:

1. *Ensure that the building is in a good state of repair*
2. *Minor interventions - upgrade the easier and non-contentious elements:*
 - *insulate roof spaces and suspended floors;*
 - *provide flue dampers - (close in winter, open in summer);*
 - *provide energy efficient lighting and appliances*
 - *draught-seal doors and windows;*
 - *provide hot water tank and pipe insulation.*
3. *Moderate interventions - upgrade vulnerable elements:*
 - *install secondary (or double) glazing (if practicable);*
4. *Upgrade building services and give advice to building users on managing them efficiently:*
 - *install high-efficiency boiler and heating controls;*
 - *install smart metering;*
 - *install solar panels, where not visible from the street or public spaces.*
5. *Major interventions - upgrade more difficult and contentious elements (where impact on heritage values and level of technical risk shown to be acceptable)*
 - *provide solid wall insulation.'*

Energy Efficiency Planning Guidance for Conservation Areas (not dated)

2.33 This document provides guidance to residents who are considering making energy efficiency improvements to residential properties in conservation areas. The guidance relates to unlisted buildings only.

2.34 The guidance notes that National planning policy does not give greater weight to heritage or energy conservation – they are both important. It quotes the NPPF (March 2012) noting:

‘On heritage, any development should:

“...conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.”

On energy conservation, any development should:

“...support the transition to a low carbon future... (and) encourage the re- use of existing resources, including conversion of existing buildings and encourage the use of renewable resources.”

2.35 The guidance sets out the energy hierarchy at section 2: ‘*Be lean*’ – use less energy; ‘*Be clean*’ - supply energy efficiently; and ‘*Be green*’ – use renewable energy. It goes on to consider a case study which includes solar panels and solid wall insulation noting the cost and potential visual impact of both, as well as the risks of sealing old houses with the later.

2.36 Section 3 goes on to give more specific advice in respect of the historic environment noting ‘*Understanding how your proposed works will impact on the character and appearance of your property, and the wider conservation area, is an important part of planning your energy efficiency retrofit. Energy efficiency works need to maximise their impact and savings – as well as ensuring they don’t detract from what is special about the conservation area as a whole.*’ And going on to say, ‘*whilst historic buildings are celebrated for their unique and interesting character, in a conservation area it is often the uniform look of the front of the houses that is the most attractive element.*’

2.37 The guidance notes that the impact of energy efficiency measures on the heritage significance of a building and the wider conservation area can be visual and /or physical:

‘Visual impact

The extent of visual impact depends on how far from the existing palette of materials and detailing the proposal goes, and the extent to which it is visible. It is important

therefore to consider the design, materials and siting of measures carefully so as to minimise this impact.

Physical impact

The physical impact depends on the work undertaken and how it is installed. Some measures may require the removal of historic fabric (e.g. historic joinery, roof slates, lime plaster), or may have an unintended detrimental impact on fabric if not installed with due care. For example, internal insulation should be designed to allow the passage of air and moisture through the building to prevent condensation and rot of timbers.'

- 2.38 It goes on to note, *'These impacts may be possible to reverse at some point in the future (e.g. the removal of solar panels from roofs at the end of their lifespan) or semi-permanent (such as the application of solid wall insulation). Reversible measures may have significant visual impact in the short to medium term, but they leave open the opportunity to amend this in the event of future technological or design advances. Permanent measures cause irreversible change to the fabric and/or appearance of the building so it is essential that these are very carefully designed and installed.'*
- 2.39 Section 3 looks in more detail at energy efficiency measures.
- 2.40 In respect of external solid wall insulation ('ESWI') it notes it is unlikely to be acceptable on the front or to rear if part of a uniform architectural composition but may be acceptable on the side subject to effect on eaves and details. It goes on to say it *'is likely to be acceptable to the rear elevation of a property where the elevation is not part of a decorative or uniform architectural composition provided:*
- render or other finishes match the colour and texture of the prevailing brickwork and/or the predominant existing render / paint colour, where it exists*
 - the materials can demonstrate adequate longevity and durability - junctions with adjoining properties and around window and door reveals are sensitively considered.'*
- 2.41 In respect of replacing single glazed windows with new double glazed windows, it notes *'it is relatively easy to source high quality double glazed timber windows which match the features and appearance of the existing window while significantly improving their thermal performance'*; and that *'to achieve appropriate glazing bar widths, slim-line double glazed units may need to be specified.'*
- 2.42 In respect of PV panels it notes on *'mansards or pitched roofs incorporating areas of flat roof - the flat sections offer some opportunity for siting solar panels with minimal visibility from the public realm'*; and that an *'alternative approach to solar photovoltaic panels are solar slates or tiles.*
- 2.43 In respect of public benefits (in terms of balancing any heritage harm), the guidance notes that, *'Energy efficiency measures and renewable energy technologies can generally be said to benefit the wider public by virtue of the contribution they make to*

controlling domestic energy costs, reducing fuel poverty and/or limiting carbon dioxide emissions, which are considered to contribute to climate change.'

- 2.44 In respect of Fuel Poverty the guidance notes '*Where particular homes within a conservation area are known to suffer from fuel poverty or wider deprivation, and the energy saving improvements can clearly demonstrate that they will reduce fuel bills and improve well-being, the local public benefit is easier to determine. In such cases, a greater degree of change may be acceptable. However, it will still always be necessary to consider the proposed change, and any potential precedent it may set, against the significance of the heritage loss.'*

Other guidance

Historic England Advice Note 1, Conservation Area Appraisal, Designation and Management (Second Edition) (February 2019)

- 2.45 The purpose of this note is to provide information on conservation area appraisal, designation and management to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment legislation, the policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). The advice in this document emphasises that evidence required to inform decisions affecting a conservation area, including both its designation and management, should be proportionate to the importance of the asset.
- 2.46 At paragraph 4 of the introduction it states, 'Change is inevitable, and often beneficial, and this advice sets out ways to manage change in a way that conserves and enhances the character and appearance of historic areas', and that 'Conservation areas can contribute to sustainable development in all its three dimensions as outlined in the NPPF.

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 2.47 The purpose of this note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding.

- 2.48 In terms of general advice on decision-taking it notes at para 4 that, *'The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance'*. The guidance goes on to suggest a number of common steps in assessing significance.

The Setting of Heritage Assets: Historic England: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) December 2017

- 2.49 This guidance states that it provides *'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties'* and that *'alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.'*
- 2.50 At para 9 it states that, *'Setting is not a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated Its importance lies in what it contributes to the significance of the heritage asset or the ability to appreciate that significance.'*
- 2.51 At para. 18 the guidance states that the *'Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development.'* It goes on to say that *'many places coincide with the setting of a heritage asset and are subject to some degree of change over time'*.
- 2.52 The guidance proposes a five stage programme of assessment: (1) *identifying the assets affected;* (2) *assessing the degree to which the setting make a contribution to the significance of a heritage asset or allows the significance to be appreciated;* (3) *assessing the effect of the proposed development;* (4) *maximising enhancement and minimising harm;* and (5) *making and monitoring the decision and outcomes.*

Historic England Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)

- 2.53 Historic England issued Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets in October 2019. The note covers the NPPF requirement that heritage significance is described in order to help local authorities make decisions on the impact of proposals for change to heritage assets. It states, in paragraph 2 of the introduction, that *'the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance'*. It describes a statement of heritage significance

as *‘an objective analysis of significance, an opportunity to describe what matters and why’*.

- 2.54 The advice note states that a staged approach to decision making, where the significance is assessed before the design of the proposal commences, is the best approach. It states in paragraph 29, under ‘proportionality’, that while *‘analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance’*.

3 THE SITE AND ITS HERITAGE CONTEXT

Location

- 3.1 Nos. 1 to 32 Brookes Court, the Site, lies in the Holborn district of the London Borough of Camden. It is situated to the south of Baldwin's Gardens, which runs east/ west between Leather Lane and Grays Inn Road (A5200). It is bisected by a pedestrian route towards its centre (also named Brookes Court) running east/ west between Brookes Market at the junction of Brookes Street/ Dorrington Street and Gray's Inn Road.
- 3.2 The Site does not lie within a conservation area nor does it include any heritage assets. Its heritage context is set out below.

The Site

- 3.3 The Site comprises 4 separate blocks of housing. North of the pedestrian route, either side of a short cul-de-sac, is a terrace of six 2 storey houses with mansard roofs to the west, and six bungalows to the east. South of the pedestrian route is a terrace of four 2 storey houses with mansard roofs on the east side of a pedestrian way (with a mosque to the west outwith the Site), and a 5 storey apartment block (including an exposed basement) to the east of this overlooking Brookes Market. There is a temporary boiler serving the development sited on the pedestrian route immediately north of the mosque.
- 3.4 The blocks are all brick faced with slate clad/ hung roofs, and all originally had metal framed sash style windows (some have been replaced). The apartment block has a mono pitch roof expressed as a mansard to the top floor to the west; and an entirely brick faced east elevation articulated with projecting and inset balconies. The terraced houses have asymmetrical mansard style roofs, and the southern terrace is stepped in plan. The bungalows have courtyards (those at either end open to the street) and porches with tile hanging detail.
- 3.5 The Pevsner volume for North London notes in respect of the Site, '*transformed in the 1970s by a mixture of friendly, compact, low rise housing, a surprising oasis*'. The blocks provide good quality public housing of a modern design typical of the period but are unremarkable architecturally. They have lost some uniformity through replacement windows and piecemeal changes in places. The main positive aspect of the development is that it provides pleasant arrangement of various housing types.

Site context

- 3.6 Adjoining the northern section of the eastern Site boundary is St Alban's Church (listed grade II*, see below), which is set back from Baldwin's Gardens and runs up to the pedestrian route that crosses the Site (the rear of some of the bungalows on Site and the boundary wall to the pedestrian route abut the church). South-east of the pedestrian route the apartment block on Site overlooks Brookes Market. To the west the properties back onto the rear of nos. 38 to 46 Gray's Inn Road (locally listed). To the south the Site adjoins the flank of nos. 14 to 22 Grays Inn and 30 Brook Street. On the north side of Baldwin's Gardens, opposite the Site, is Courtfield House, and St Alban's Church of England Primary and Nursery School.
- 3.7 The area around the Site is of varied townscape character and quality, much of it, like the Site, excluded from the surrounding conservation areas, see below.

Heritage context

- 3.8 To the east the Site adjoins the varied western boundary of the Hatton Gardens Conservation Area (see plan below); and to the west, on the west side of Grays Inn Road, is the eastern boundary of the large Bloomsbury Conservation Area.
- 3.9 The Church of St Alban is listed grade II* and the adjoining Clergy House (no. 18 Brookes Street) is listed grade II. To the south-east is the large modern extension forming part of the grade II* listed Prudential Assurance Building (which fronts Holborn).
- 3.10 The National Planning Policy Framework defines heritage significance at 'Annex 2: Glossary' as:

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

- 3.11 In line with PPG paragraph: 006, the statements of significance below consider the various heritage interests of the identified heritage assets as follows:

'Archaeological interest *There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

Architectural and artistic interest *These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and*

decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

Historic Interest *An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.'*

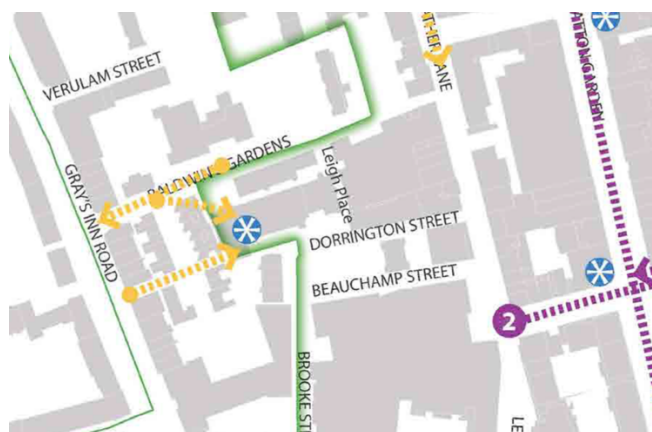
- 3.12 The assessments of significance below are based on on-site visual inspection, online research, and the Council's SPGs. They are proportionate both to the importance of the assets and to the nature and extent of the application proposals. They are sufficient to understand the potential impact of the Proposals on heritage interest.

Hatton Gardens Conservation Area

- 3.13 The Hatton Garden Conservation Area was designated in 1999. The conservation area covers approximately 20 hectares west of Farringdon Road and occupies the south-east corner of the London Borough of Camden. The entire eastern edge of Brookes Street, including the Site, is excluded from the conservation area. The modern extension to the Prudential Assurance Building is included in the conservation area.
- 3.14 The Hatton Garden Conservation Area Appraisal and Management Strategy (the 'Appraisal') was adopted in August 2017. This comprehensive assessment notes, *'the historic character of the conservation area derives largely from its many robustly detailed industrial, commercial and residential buildings of the late nineteenth to mid twentieth centuries, combined with an intricate street pattern that is overlaid on undulating topography. This character is closely related to the history of metal working and other industries that have been carried out here. At the heart of the district is Hatton Garden, well known as the focus of London's jewellery trade'*.
- 3.15 The Appraisal states the character of the area is varied, with no single period, style or use predominating. It divides it into 6 character sub-areas. The Site lies in 'Sub-area 3: The Trading Centre' which comprises the grid of streets laid out by Christopher Hatton III in 1659 and the adjacent enclaves of Brooke's Market and Ely Place.
- 3.16 The Appraisal notes *'This fine-grained area accommodates a variety of specialist shops, workshops and offices, many linked with the diamond and jewellery trade. The regularity of the street grid creates a strong sense of formality, tempered by the fall of land to the east. The principal feature is Hatton Garden, unusually straight and broad for a London street. The straight streets of Sub-area 3 rely for much of their visual effect on variation in the frontages, which is ensured where the original plot widths*

survive. The survival of many original plot widths lends a satisfying rhythm to the east side of Hatton Garden and to both sides of Greville Street and St Cross Street. However, the west side of Hatton Garden and both sides of Kirby Street have a weaker character owing to the amalgamation of many of the original plots'; and, in respect of that part adjoining the Site, 'Brooke's Market, formed through slum clearance c. 1900, suffers from a tall, inactive frontage on its south side, but its enclosed plan is successful in creating a quiet oasis from the bustling Leather Lane. To the north of Brooke's Market is an area remodelled after bomb damage and without strong character but with the remains of an alley, Leigh Place, that serves as a reminder of its early history.'

- 3.17 In terms of the architectural character of sub-area 3 the Appraisal notes 'the buildings of this sub-area are varied in period, style, materials and height'. It goes on to say that 'Brooke's Market has a strong character which comes from a series of brick buildings whose frontages directly address the central open space and its mature trees, but the south side of Brooke's Market and Brooke Street suffer from the inactive frontages of the Waterhouse Square development'. The latter is faced in polished stone, the Beauchamp Building to the east is rendered and painted white, and no. 16 (The Lodge at St Ursulas) on the north side is painted white – all lie within the conservation area. A similar variety of finishes and materials can be found on nearby Leather Lane and Hatton Gardens, the main route in the conservation area.
- 3.18 The Appraisal identifies 4 important views (none of which are of the Site), locally significant views (which include views along the pedestrian alley towards the church; of Grays Inn Road along Baldwin Gardens, and of the Church of St Alban from Baldwin Gardens looking across the Site); as well as landmarks, including the Church of St Alban: see the plan below. It goes onto say 'Key and locally significant views are identified in paragraphs 5.23 to 5.28 both into and out of the conservation area. These could be adversely affected by development outside of the conservation area'; and that 'any development outside of the conservation area should preserve, or where appropriate take opportunities to enhance, its setting'. No views of or from Brooke's Market are identified.



Extract of plan from the Appraisal showing conservation area boundary (green line) and locally significant views (dashed yellow lines)

Bloomsbury Conservation Area

- 3.19 The Bloomsbury Conservation Area was designated in 1968 and has been extended on numerous occasions since. It covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south, and from Tottenham Court Road in the west to King's Cross Road in the east.
- 3.20 The Council's Bloomsbury Conservation Area Appraisal and Management Strategy was adopted on 18 April 2011 and states that Bloomsbury is widely considered to be an internationally significant example of town planning. It splits the conservation area up into 14 sub-areas. In respect of that part closest to the Site, Sub Area 9: Lincoln's Inn Fields/Inns of Court/High Holborn, it notes '*Established in the 14th century within medieval manor houses, the Inns of Court of Lincoln's Inn and Gray's Inn have a unique character in the context of the Bloomsbury Conservation Area and London as a whole*'; and that '*Much of the sub area has a secluded and peaceful ambience, with a collegiate feel derived from the courtyard elements*'.
- 3.21 No views of the Site are identified in the Council's Appraisal.

Listed buildings

- 3.22 There are 4 listed buildings in the area around the Site as set out below.
- 3.23 **The Church of St Alban the Martyr, Brooke Street** is listed grade II*. It was designed in 1859 by the architect William Butterfield and built in 1861-6. The chapel dates from 1891 and was designed by CHM Mileham. It was burnt out in 1941 and restored in 1959-61 by Adrian Gilbert Scott. It is built of red and yellow stock bricks with stone dressings in the Gothic style and has tiled roofs. It is described as being a very tall, wide, aisled church with short transepts abutting the western tower which has a saddleback roof.
- 3.24 **St Alban's Clergy House and attached railings with lamp-holder, no.18 Brooke Street** are listed grade II. The Clergy House of 1860 is by William Butterfield. It is built of brown brick with red brick and stone dressings in the Gothic style, with a slate roof with 2 gables.
- 3.25 **The Prudential Assurance Building, no. 142 Holborn Bars** is listed grade II*. That part by the Site comprises a large modern office extension.
- 3.26 **Nos. 12, 13 and 14, the Gatehouse and attached railings, Gray's Inn Square, Gray's Inn** are listed grade II*. They comprise 3 terraced chambers and a gatehouse fronting Gray's Inn Road built c1684-88, with later restorations.

Registered Park and Garden of Special Historic Interest

- 3.27 Gray's Inn to the west is a grade II* Registered Park and Garden of Special Historic Interest ('RPGSHI') which includes C16th walks and gardens, laid out under the direction of Francis Bacon, that were altered from the C18th onwards.

4 ASSESSMENT OF EFFECT & CONCLUSIONS

- 4.1 This section describes the Proposals as relevant to the consideration of effects on heritage significance. Reference should be made to the preapplication pack and covering letter prepared by Baily Gardner.
- 4.2 The application will include full details of the alterations to the external appearance of the blocks showing details of junctions/ relationship with eaves/ parapets, balconies openings, cills etc. This information will include typical cross section drawings through the façade picking up on openings and the roof slopes (top to bottom), and horizontally at the junctions/ corners.

Description

- 4.3 The Proposals comprise various alterations adopting a fabric first approach to enhance the energy performance of the buildings as set out below:
- Replacement of windows and doors.
 - External wall insulation.
 - Roof insulation (mounted below the slates).

Assessment

- 4.4 The heritage assets in the area around the Site are set out in section 3. The scale of the works and nature of the surrounding townscape are such that there will be no effect on the setting of the Prudential Assurance Building, no. 142 Holborn Bars; nos. 12, 13 and 14, the Gatehouse and attached railings, Gray's Inn Square, Gray's Inn; the Bloomsbury Conservation Area; or the Gray's Inn RPGSHI.
- 4.5 The heritage effects will be limited to those on the settings of the Church of St Alban, its Clergy House, and the Hatton Gardens Conservation Area.
- 4.6 The intention is that the external wall insulation should seek to complement the character and proportions of the existing buildings. A brick effect render is one option but a plain effect render, of a similar colour to the existing brickwork, could provide a better and more cohesive effect overall that is of a less contrived appearance - particularly in light of the various junctions, walls that cannot be insulated, and details such as the balconies etc. that need to be addressed. It may also be more durable as a finish and more easily maintained.
- 4.7 The roof insulation will be applied below the slates (which will be removed and rehung). The Proposals will maintain a similar proportional relationship with the

elevations (externally clad) below as part of these works and the overall effect on the appearance of the roofs will be minimal.

- 4.8 The replacement windows and doors will be of a high quality design and materials. In this case a slimline aluminium framed window is proposed, matching the material of the existing windows, but with casement openings rather than a sash mechanism. It seems over onerous in this case to insist on like for like replacements, particularly when the tenants may prefer an alternative design, or windows of an alternative design may perform better in respect of energy performance. The introduction of solid more thermally efficient panels (as opposed to glazing) in the lower panels of the bungalow windows will have a minimal visual effect overall.
- 4.9 The Site makes a neutral contribution to the setting of the surrounding heritage assets at present. It is relatively modern in date, was omitted from the conservation area and is not covered by any other heritage designations. The buildings are unremarkable architecturally and some changes have taken place.
- 4.10 The Council's guidance '*Energy Efficiency Planning Guidance for Conservation Areas*' provides guidance on making energy efficiency improvements to residential properties in conservation areas. In respect of Visual impact, it accepts that the appearance of a building may change and that '*The extent of visual impact depends on how far from the existing palette of materials and detailing the proposal goes, and the extent to which it is visible. It is important therefore to consider the design, materials and siting of measures carefully so as to minimise this impact.*' The Site does not lie in a conservation area and such an approach should therefore be applied more flexibly in this instance.
- 4.11 Changes of an appropriate quality of materials, detailing and finish, to the appearance of the buildings on Site, which maintain a uniform appearance overall, would not harm the settings of the nearby listed buildings or the setting of the conservation area. It seems reasonable in this case to take an approach where the performance and usability of the final design (for example windows that may open differently), is of equal importance to the need to match the existing appearance of the blocks. The key consideration should be achieving a high quality cohesive appearance for the scheme. Illustrating the energy efficiency measures as part of this (as opposed to attempting to conceal the changes) could become a positive aspect of the design highlighting the Council's commitment to energy performance in their own housing stock.

NPPF and consideration of harm

- 4.12 The buildings on Site are not in a conservation area, nor are they locally listed. The main consideration should be the quality and cohesiveness of the appearance of the buildings once the works are complete. An approach that does not mimic the

existing building materials, detailing and appearance, but would result in a better outcome in terms of appearance and performance seems reasonable in this instance.

4.13 The Proposals, irrespective of the final details, will deliver several enhancements to the appearance of the buildings. These include:

- An attempt to return uniform fenestration across the whole scheme.
- Repair and general maintenance of the buildings.
- Removal of clutter from the façades.

4.14 Should officers find any harm as a result of the Proposals, any such alleged harm caused to the setting of heritage assets could only be said to be '*less than substantial*' in term of the NPPF, and at the very low end of this scale. There will be no direct effects on any heritage asset. This low level of '*less than substantial*' harm would, in line with para. 202 of the NPPF, be balanced by the public benefits the Proposal would deliver including:

- Implementing measures to protect the environment; and
- Addressing fuel poverty.

Conclusions

4.15 The Proposals are an intelligent response to the Site and its heritage context. They are based on a clear understanding of the design of the host buildings and the significance of the nearby heritage assets. The Site does not lie within or include any heritage assets. Special attention has been paid to the effect of the proposed development on the setting of heritage assets. There are no harmful effects to any heritage asset and the Proposals accord with the objectives set out in sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended). The Proposals are in line with the policies and guidance on design set out in the NPPF and PPG; local policies and guidance and HE guidance.

GJHP
May 2022