

appendix 1; further illustrating the evolution of the area. Paragraph 4.1 sets out in overview that:

“The Bloomsbury Conservation Area covers an area of London that expanded rapidly northwards during the period 1660-1840. Impetus for the initial development came from events such as the plague of the Black Death (1665) and the Great Fire of London, which had devastated the City. The building of Covent Garden, nearby to the southwest, however, was a key architectural development which strongly influenced the form of Bloomsbury. In 1630 the developer, the Duke of Bedford, and his architect, Inigo Jones, introduced Palladian architecture to England in the form of a public square, addressed by a church and arcaded terraces of houses, and surrounded by grids of streets. This was a key departure from the prevailing pattern of development, based on narrow medieval streets, alleys and courtyards, and set the scene for the next three centuries.”



Figure 3.14: Extract of Morgan’s Map of the Whole of London 1682 (with a focus on the Bloomsbury area)

- 3.46 Prior to the late-17th century, the area of Bloomsbury comprised agricultural and pastoral land associated with a series of medieval manors on the periphery of London. The first phase of development in the late-17th century consisted of a mix of uses, including houses and a market along with commercial buildings, hospitals and churches. Morgan’s Map of the Whole of London dated 1682 (**Figure 3.12**) shows that by this time, the development spreading north of High Holborn included Southampton House (the London home of the Early of Southampton, built 1657); Montague House (owned by the Duke of Montagu, built 1675-9 and from 1759 used as the British Museum until its demolition); Bloomsbury Square (1661); and Great Russell Street (c.1670). As well as these key landmarks and infrastructure, there was a hinterland of smaller streets and houses, along with a market.
- 3.47 Study of Cary’s later and relative detailed plan of London, Westminster and Southwark 1795 shows that the development of Bloomsbury progressed only slowly over the 18th

century. Bedford Square had been laid out as a unified architectural composition in 1775-6, and its construction marked the beginning of the more systematic development of the land to the north. Gower Street, a key north-south route, was developed immediately after Bedford Square, along with other streets like Bedford Avenue, Store Street and Chenies Street. These were lined with narrow fronted terraces which enabled the developers to maximise the number of dwellings that could be built in each street. Other notable additions to the early development of Bloomsbury include the distinctive parish church of St George - built between 1716-1731 by Hawksmoor under the Fifty Churches Act following the Great Fire, and the Foundling Hospital - founded in 1742 by Captain Thomas Coram to address the state of London's poorest children.



Figure 3.15: Bloomsbury Square today - first laid out 1661

- 3.48 Occupying land previously used as a series of Medieval Manors on the periphery of London and their associated agricultural and pastoral land, the first phase of development consisted of a mix of uses with houses, a market, commercial, cultural uses (the British Museum), hospitals and churches. Later expansion of the northern part of the conservation area in the 19th century was focussed on providing higher status residential districts for wealthy families. This was often carried out speculatively by a number of builders, on leases from major landowners, and followed a consistent form with terraced townhouses constructed on a formal grid pattern of streets and landscaped squares.
- 3.49 More rapid expansion of the northern part of the conservation area occurred during the 19th century, catalysed by the conception of plans for the development of the Duke of Bedford's estate. New development was focussed on providing grander residential districts for wealthy families, whilst more widely, new uses emerged and existing ones

expanded. Building agreements for Russell Square were granted in 1801 and the building work, designed by James Burton with a garden square by Humphrey Repton, was largely completed by 1804. Montague Place and Keppel Street were developed from 1800-1810 by builders including Hendry and Thomas Lewis. At the same time, Alfred Place was laid out as an area of high-status, large town houses by George Dance the Younger, surveyor for the City of London Corporation. Euston Square on the Southampton Estate was also laid out during the first years of the 19th century.

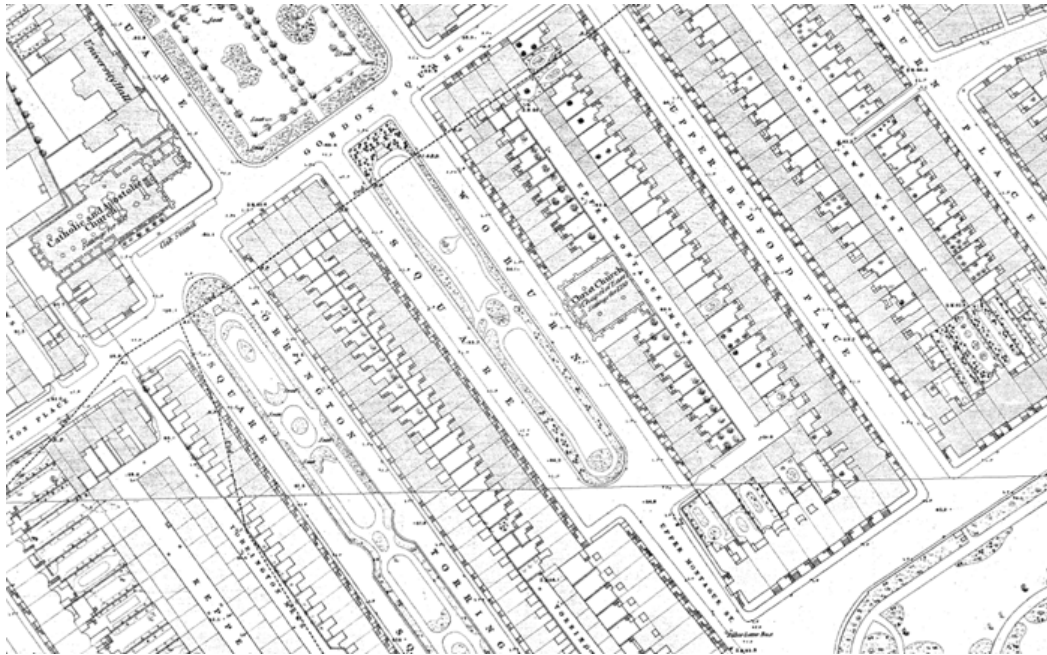


Figure 3.16: Extract of Ordnance Survey (OS) map dated 1875 (focused on early 19th century layout of Woburn Square and surrounding streets and squares)

- 3.50 The later 19th century saw many of Bloomsbury's wealthy residents move away to more attractive and spacious suburbs further to the north and the area came to attract new uses and expand upon existing ones. These included industrial development in the Fleet valley as well as growing educational establishments, hospitals around Queen Square and the expansion of the British Museum. New shopping and commercial facilities were also introduced in areas such as New Oxford Street to the south.
- 3.51 During the 20th and 21st centuries, the expansion of hospital, academic and cultural uses continued, particularly around the University of London and hospitals. Bloomsbury has also been marked by more widespread change as the area has sought to accommodate new uses and modes of transport into the city centre, such as the large scale infrastructure of the Euston Road to the north.



Figure 3.17: Townscape contrast of 19th century domestic terraces and later 20th century University redevelopments within the street pattern

Character and Appearance

- 3.52 The conservation area is characterised primarily by a sequence of planned residential streets and leafy squares laid out speculatively by various developers from the 17th century onwards. The quintessential character of the conservation area derives from the grid of streets enclosed by mainly three and four storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points.



Figure 3.18: The intact centrepiece townscape scheme of Bedford Square today

- 3.53 There is also a distinct hierarchy of scales across the conservation area with major arterial routes having larger scale buildings, addressing broader, busier streets. This contrasts with the smaller scale, finer grained streets in other part of the conservation area where there are a larger number of narrower streets and alleyways which are

intimate spaces with a particular charm and often diversity. The Bloomsbury Conservation Area Appraisal from 2011 states that:

“Overall, the area’s hierarchy of main arterial routes, grids of streets, rear mews spaces and narrow lanes creates a noticeable transition in the sense of enclosure moving around the Conservation Area. This dynamic spatial character emphasises the difference in the scale of the component streets and spaces, making each component element and the difference between them notable.” (Paragraph 3.13)

- 3.54 A range of building types is evident across the conservation area, although the predominant type is the terraced townhouse. Shops and public houses are a feature of parts of Bloomsbury, generally forming part of or having been inserted into the earlier terraces, reflecting the growth in commercial activity in the area. Also interspersed across the area are several set piece or landmark buildings, including churches and cultural buildings. The many later University, hospital and other institutional buildings have introduced a larger scale to the earlier established street pattern of terraces, and also the megastructure of the Brunswick Centre which introduced a new giant scale and modern concept of pedestrian and vehicular segregation to the townscape.



Figure 3.19: Interwar Senate House at University of London, Malet Street (L) and 21st century World Conservation wing to the British Museum (R)

- 3.55 Brick is the predominant building material within the area, which is often complemented by different colours of brickwork, terracotta, stone and stucco render to dress the many 18th and 19th century buildings. More modern buildings have also introduced new materials such as concrete and steel and glass to the diverse palette of materials across the area. The gradual development and redevelopment of the area over the centuries has contributed to the varied architectural styles of buildings that can now be found across the area, from the dominant Classically inspired terraced townhouses of the 18th and 19th century to the Modernist and Brutalism of buildings for the University of London.
- 3.56 The Bloomsbury Conservation Area Appraisal 2011 sets out that owing to the size, general diversity and complexity of the conservation area, it has been sub-divided into a series of character areas that generally share common townscape characteristics to assist in defining those features that contribute to the area’s special interest overall. These sub areas are described in its section 5. The site at No. 196 Tottenham Court Road falls within “Sub-Area 4: Grafton Way/Alfred Place/Tottenham Court Road”; a more

detailed map of which is included again at **Figure 3.21** below for ease of reference.

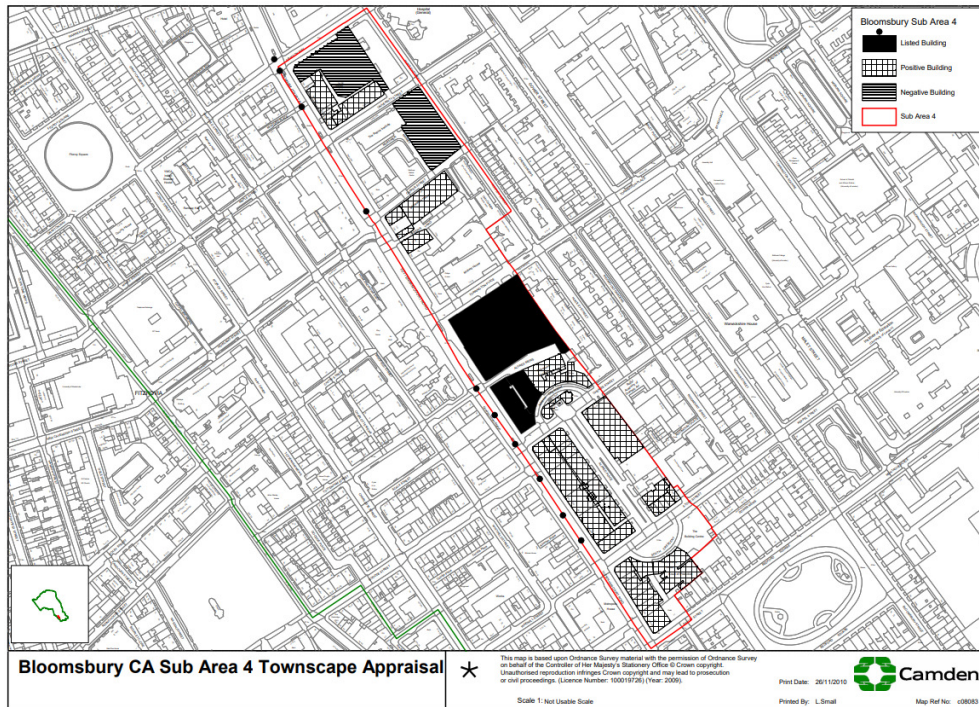


Figure 3.20: Map of Sub Area 4 extracted from the Bloomsbury Conservation Area Appraisal 2011

3.57 The Bloomsbury Conservation Area Appraisal describes each of the sub-areas on a street by street basis. For the principal north-south route of Tottenham Court Road (and also later for the secondary or feeder streets between the urban blocks to its east) this document describes:

“5.48 Tottenham Court Road is a busy one-way street, part of the main route north from Charing Cross to Hampstead. Much of its Victorian commercial architecture has been replaced with postwar buildings, in particular in the stretch north of Torrington Place where there are large number of buildings dating from the 1950s to 1970s. However, the southern stretch benefits from some fine examples from the pre-1880 to 1940 period. The Heal and Son Ltd furniture store is a notable survivor of its original buildings...”

3.58 The heights of buildings within this area are consistent, primarily four to five stories in height. Owing to the predominately commercial nature of the street the buildings are also noted to share a consistency of scale and massing with the facades constructed in a variety of materials and embellished with a range of decorative motifs to give visual interest and a distinct character to the street facing elevations, particularly towards the upper floors and at roof level.²⁴

²⁴ London Borough of Camden, Bloomsbury Conservation Area Appraisal and Management Strategy, April 2011, pg. 35.



Figure 3.21: Tottenham Court Road – view looking south from the Heals Building

- 3.59 The Bloomsbury Conservation Area Appraisal specifically describes the Heals Building Complex as:

“5.53 To the south of the junction with Torrington Place, the grade II listed Heal’s Building is situated at Nos 191-199 (consec) Tottenham Court Road. In Nikolaus Pevsner’s words (The Buildings of England, London 4: North), the central portion of the building dating from 1912-17, by Smith and Brewer, is ‘the best commercial front of its date in London’, with fine reticent stone uprights in a rhythm which avoids uniformity, and decorative cast-iron panels by Joseph Armitage. In 1936-38, the shop was extended to the south by the architect Edward Maufe, continuing with the same proportion. The extension to the north, which houses Habitat, dates from 1968 and was designed by Fitzroy Robinson and Partners in a postwar idiom with simplified detail. The ground floor of the original building has shop windows which are discreetly set back to allow wide pavements and an arcaded walkway. The Habitat shopfront has a concave display window which creates interest in the street scene”*



Figure 3.22: The Heals Building Complex looking east at the junction with Alfred Mews

- 3.60 The Bloomsbury Conservation Area Appraisal characterises the other connecting routes, particularly to the north nearby the Heals Building Complex and describes:

“5.117 The Tottenham Court Road frontages between University Street and Torrington Place are more varied, with narrower and more varied plot widths containing buildings of up to six storeys dating from the 1930s to the 1980s.”

- 3.61 The Bloomsbury Conservation Area Appraisal takes a wider perspective on the relative importance of views within this area, and how they help us to understand or appreciation heritage significance. For the area as a whole this is described in paragraphs 3.14-3.16. With regard to landmark buildings within the townscape it is set out that:

“There are a few notable views to landmarks within and outside the Conservation Area that assist orientation and navigation, the main ones being:

- 1. View west along High Holborn to Commonwealth House;*
- 2. Views east and west along Euston Road to St Pancras Church;*
- 3. View north along Judd Street to St Pancras Station and the British Library;*
- 4. Views of Senate House from Russell Square in the east and Store Street/Tottenham;*
- 5. Court Road in the west; and*
- 6. Views north along Coptic Street, Museum Street and Bury Place, and east and*

west along Great Russell Street of the British Museum ...”

Summary of Significance

- 3.62 Overall, the significance of the Bloomsbury Conservation Area is as a large townscape area comprising a series of planned elements of formal townscape as the city of London expanded northwards during the 17th and 18th centuries, and later redevelopments of the 19th to 21st centuries.
- 3.63 It is principally characterised by a sequence of planned residential streets and garden squares enclosed by terraced buildings laid out in a hierarchal fashion extending out of the main arterial routes. Bloomsbury has also continually adapted to accommodate different uses over time, and also includes a number of larger scale townscape elements primarily associated with major educational or cultural institutions such as the British Museum and University of London.
- 3.64 The conservation area has historical interest in illustrating the expansion, population growth and prosperity of this part of London from the 17th century, and also how its use and character has continued evolved up to the present day. It also has architectural interest in illustrating past approaches to planning, architectural design, style and use of materials across this period, which has resulted in a rich and diverse townscape of buildings and space with a distinctive sense of place.



Figure 3.23: Early 19th century Gordon Square – view looking south along east side

Contribution of Site to Significance

- 3.65 Firstly, the townscape analysis provided on the map for Sub-Area 4 within the adopted Bloomsbury Conservation Area Appraisal from 2011 recognises the importance of site as a listed building (**Figure 3.23** - bold). The importance of the building is further confirmed in the text of the Appraisal document; which features an entire paragraph on the complex itself, stated above as well as a mention in the introduction that “The Heal and Son Ltd furniture store is a notable survivor of its original buildings.”
- 3.66 Historically the contribution of this building to the significance of the conservation area as a whole derives from how the local landmark presence of Heals Building (an original and historic part of the commercial origins of Tottenham Court Road) and stems to some degree from its distinctive stripped classical architectural style and form, but also from its overall scale and massing relative to a generally more mixed and diminutive context of surrounding predominately commercial buildings.
- 3.67 Accordingly, the local landmark status and role of this distinctive listed building in townscape views along Tottenham Court Road and Torrington Place is an aspect of its setting that contributes to an understanding and appreciation of its heritage significance.



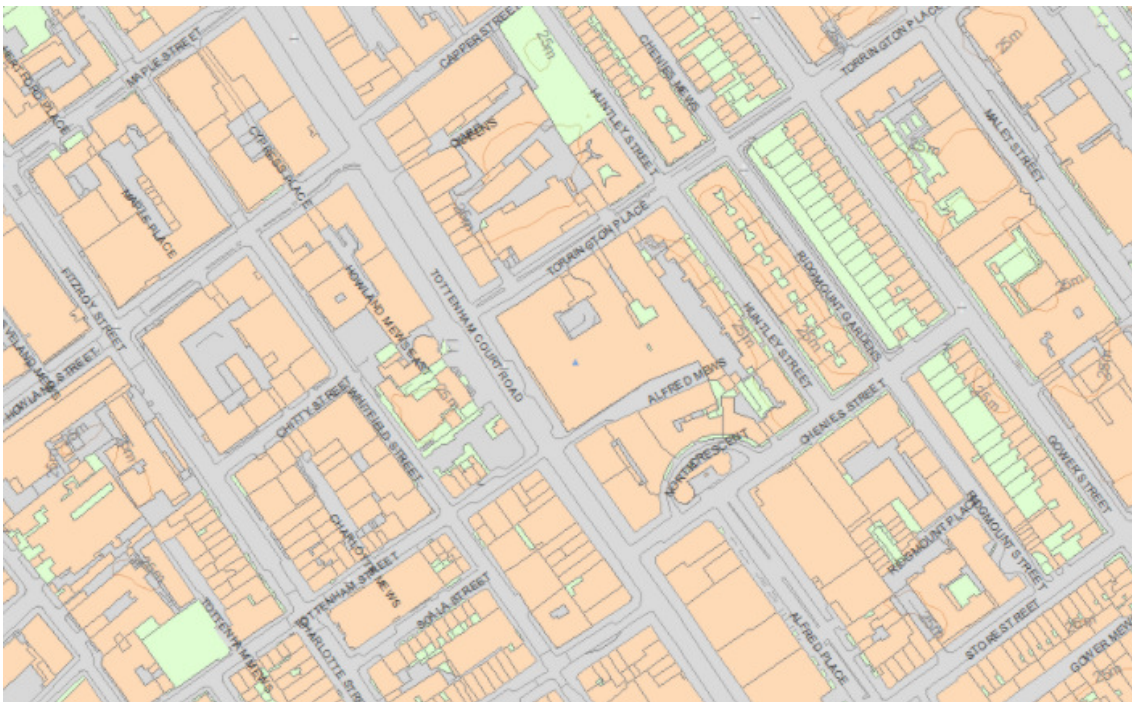
Figure 3.24: View of the Site as found today (south elevation along Alfred Mews) – secondary elevation)

- 3.68 It is our assessment that it is the principal street frontage along Tottenham Court Road that makes by far the greatest contribution to the character and appearance of the surrounding conservation area, relative to other (external) elements of this building on site. It is in this element that architectural quality and style was invested by its builder / designer; also reflecting the importance of this street and its commercial origins. It is within key views north and south along Tottenham Court Road that the historical and architectural relationship of this building within its urban block and the larger 19th century townscape scheme here can also be appreciated. It is these street fronting views that are also particularly highlighted as being of importance within the Bloomsbury Conservation Area Appraisal 2011.
- 3.69 As found today, the remaining elevations of the site building (to the north and south along Torrington Place and Alfred Mews respectively) can be observed in some glimpsed views looking north and south along Tottenham Court Road. Along Torrington Place and wrapping around on to Tottenham Court Road the particular interest of the 1960s extension rests with its external appearance including its materiality, scale, and rhythmic pattern of projection and recession which provides an elegant counterfoil to the principal elevation along Tottenham Court Road. In addition, the art deco inspired elevation along Alfred Mews is also considered to contribute to the significance of the character and appearance of the conservation area, in demonstrating the growth of the Heals Building and the wider commercial success of this sub area.
- 3.70 Overall these elements of the site building (i.e. secondary elevations); as part of street views, makes a far lesser contribution to the significance – character and appearance – of the conservation area, relative to its principal public street frontage to the west along Tottenham Court Road; and as a minor element within the context of this large and diverse conservation area as a whole.

Appendix 1: List Entry & Map (Historic England)

Overview
Heritage Category:
Listed Building
Grade:
II*
List Entry Number:
1379023
Date first listed:
14-May-1974
Date of most recent amendment:
11-Jan-1999
Statutory Address:
18-26, TORRINGTON PLACE
Statutory Address:
HEAL AND SON LIMITED INCLUDING HABITAT, 191-199, TOTTENHAM COURT ROAD

Map



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The above map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - [1379023.pdf\(opens in a new window\)](#)

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

Location

Statutory Address:

18-26, TORRINGTON PLACE

Statutory Address:

HEAL AND SON LIMITED INCLUDING HABITAT, 191-199, TOTTENHAM COURT ROAD

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Camden (London Borough)

Parish:

Non Civil Parish

National Grid Reference:

TQ 29531 81906

Details

TQ2981NE 798-1/99/1640

CAMDEN TOTTENHAM COURT ROAD (East side) Nos.191-199 (Consecutive) Heal and Son Ltd including Habitat (Formerly Listed as: TOTTENHAM COURT ROAD Nos.193-199 (Consecutive) Heal & Son Ltd)

14/05/74 GV II* Includes: Nos.18-26 TORRINGTON PLACE. Department store and warehouse. Original central section of frontage five-window bays 1914-17 by Cecil C Brewer and A Dunbar Smith; southern extension of five bays with identical style of elevation 1936-8 by Edward Maufe; northern extension of seven bays in a complementary idiom of 1961-2 by Fitzroy Robinson and Partners. Portland stone facing on a steel frame throughout. Pantiled mansard roof with dormers. EXTERIOR: Four storeys, attic and basement. Central and southern section in stripped Classical style have free-standing octagonal columns with bronze bases and caps to ground floor carrying plain entablature. Plate glass display windows are set back behind an arcade. On upper storeys, piers rise above columns to abbreviated capitals and deep entablature having enriched cornice and incised Roman lettering with the dates MDCCCX, MCMXVI and MCMXXXVII and the name "Heal and Son" (twice). The voids between the piers in alternating rhythm of single and triple lights divided by stone pilasters and filled with close-paned steel windows for two storeys, and continuous steel windows recessed on the third storey. The spandrels between first and second floors carry cast metal panels in low relief with colour designed by Joseph Armitage and depicting various wares and implements, eg. textiles, sheep shears, a bed, teazle, pottery wheel and vase.

The northern extension has a similar rhythm of bays and identical storey heights with the entablatures ranging through. Entrance in right hand bay with projecting hood bearing the royal coat of arms. Square piers to the ground floor, the set back display windows on the front and return to Torrington Place having curving non-reflective glass. Attic recessed with flat roof and projecting frame for window-cleaning cradle. The windows between piers of larger steel sections, the spandrels between first and second floors here filled with ceramic blue and cream relief panels designed by John Farleigh and made by Kenneth Clark and depicting wares interspersed with large letters "H" for Heals. INTERIOR: notable chiefly for the circular wooden staircase within a well at the rear of the store, built as part of the Smith and Brewer work in 1914-17. Both Heals and Habitat are entered through the 1960s building at ground-floor level and their plans are confusing on the other floors; they have no division corresponding to the periods of the building but over-and-undersail each other.

Listing NGR: TQ2953181906

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

478388

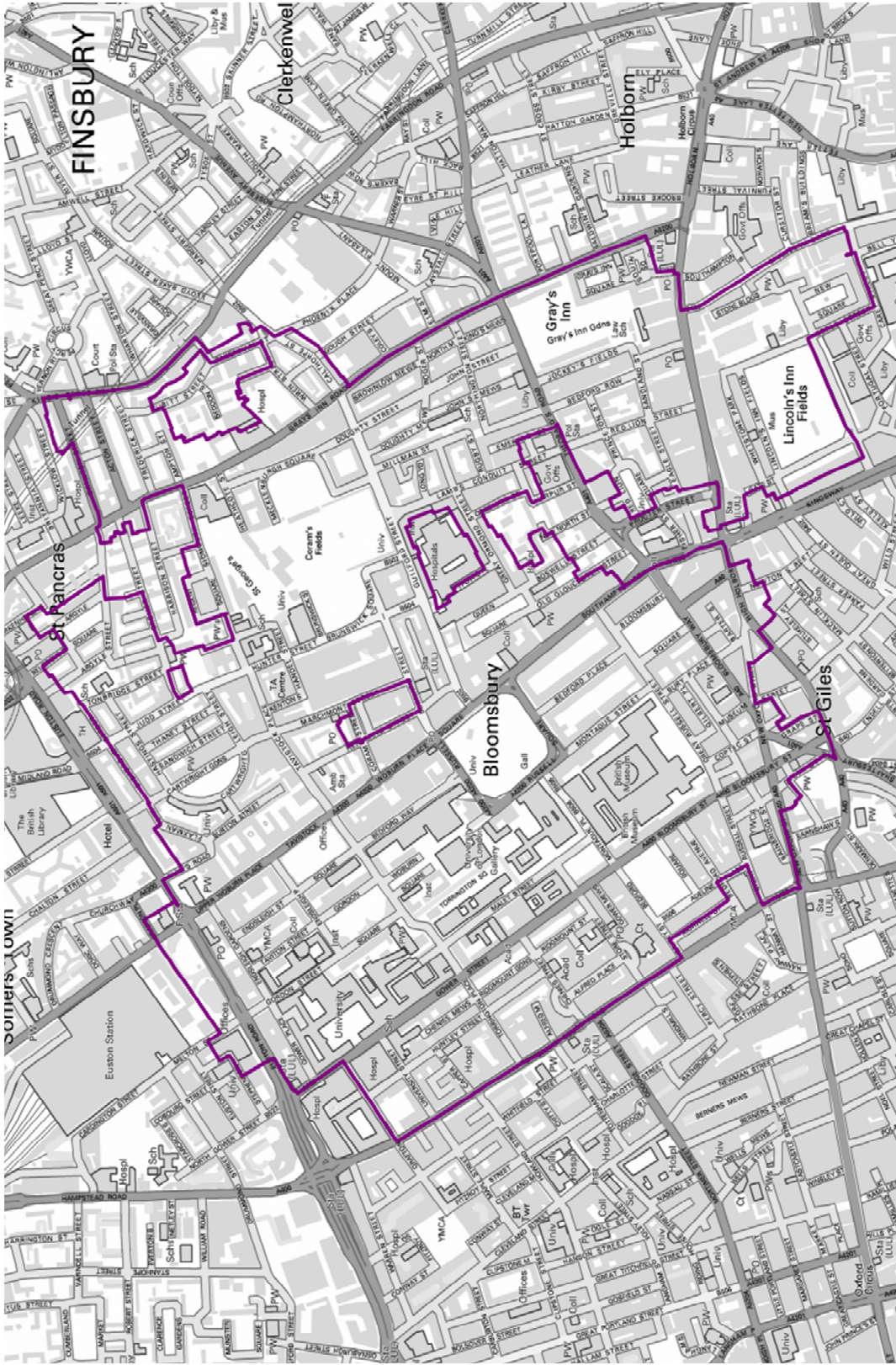
Legacy System:

LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.
End of official listing

Appendix 2: Conservation Area Boundary Map



Print Date: 10/05/2013
Map Ref No: CD3632

#Map for Internal Use Only

Reproduced from the O.S. map
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Scale 1: Not Usable Scale



Bloomsbury CA

Appendix 3: Heritage Legislation, Planning Policy and Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

Section 1(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that:

“For the purposes of this Act and with a view to the guidance of local planning authorities in the performance of their functions under this Act and the principal Act in relation to buildings of special architectural or historic interest, the Secretary of State shall compile lists of such buildings, or approve, with or without modifications, such lists compiled by the Historic Buildings and Monuments Commission for England (in this Act referred to as “the Commission”) or by other persons or bodies of persons, and may amend any list so compiled or approved.

Under sub-section (3) the Act also states that:

In considering whether to include a building in a list compiled or approved under this section, the Secretary of State may take into account not only the building itself but also:

(a) any respect in which its exterior contributes to the architectural or historic interest of any group of buildings of which it forms part; and

(b) the desirability of preserving, on the ground of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.”

Section 5 defines that “listed building” means a building which is for the time being included in a list compiled or approved by the Secretary of State under this section; and for the purposes of this Act:

“(a) any object or structure fixed to the building;

(b) any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948,”

Section 7 of the 1990 Act then provides that listed building consent is required for:

“... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest ...”

In determining such applications the following duty is placed upon the decision maker:

“s.16(2) In considering whether to grant listed building consent for any works 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.”

Section 66 of the 1990 Act also imposes a general duty as respects listed buildings in the exercise of planning functions. Subsection (1) provides that:

“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.”

Recent case law²⁵ has confirmed that Parliament’s intention in enacting section 66(1) of the 1990 Act was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means to “to do no harm” This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy. Case law has confirmed that this weight can also be applied to the statutory tests in respect of conservation areas²⁶. The Secretary of State has confirmed²⁷ that ‘considerable importance and weight’ is not synonymous with ‘overriding importance and weight’. Importantly, the meaning of preservation in this context, as informed by case law, is taken to be the avoidance of harm.

National Policy

National Planning Policy Framework (NPPF) 2021

The National Planning Policy Framework (NPPF) was first introduced in March 2012 and has subsequently been republished as revised in 2021. This change has occurred during the lifetime of this project and scheme design development. The NPPF provides a full statement of the Government’s planning policies. Chapter 16 - conserving and enhancing the historic environment, then sets out the Government’s policies regarding planning and the historic environment.

Paragraph 194 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance. Paragraph 195 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

Paragraph 197 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 further outlines that local planning authorities should give great weight to the asset’s conservation when considering the impact on a proposed development on the

²⁵ Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) English Heritage (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014

²⁶ The Forge Field Society v Sevenoaks District Council [2014] EWHC 1895 (Admin); North Norfolk District Council v Secretary of State for Communities and Local Government [2014] EWHC 279 (Admin)

²⁷ APP/H1705/A/13/2205929

significance of a designated heritage asset. The more important the heritage asset, the greater the weight should be. Annex 2 of the NPPF defined “conservation” as:

“The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.”

Paragraph 200 specifies that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Paragraph 201 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied. Paragraph 202 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.

Paragraph 203 sets out that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 206 states that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably. It outlines that local planning authorities should also look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance.

Local Policy and Guidance (the Development Plan)

The development plan for the London Borough of Merton comprises the Mayor’s new London Plan 2021, and the Camden Local Plan 2017. These documents provide local guidance with regard to development affecting heritage assets, and should accord with the statutory duties and the general principles outlined in the NPPF.

The Mayor’s London Plan 2021

The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth. This plan was adopted following the Secretary of State’s decision confirming that he was content for the London Plan to be formally published with no further changes on 29 January 2021. Borough’s Local Plans must be in ‘general conformity’ with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

Policy HC1 relates to ‘heritage conservation and growth’ and states that:

“A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets,

landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making*
- 2) utilising the heritage significance of a site or area in the planning and design process*
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

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

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

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

Camden Local Plan 2017

The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010).

The Draft Local Plan was released in 2015. Following this, public hearings were held in October 2016 and further modifications were consulted on in early 2017. Following the Inspector's report the Local Plan was adopted in July 2017, incorporating the Inspector's recommended modifications.

The Local Plan ensures that Camden continues to have robust, effective and up to-date planning policies that respond to changing circumstances and the borough's unique characteristics and

contribute to delivering the Camden Plan and other local priorities. The Local Plan will cover the period from 2016-2031.

Policy D1 (Design) sets out 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...”

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.

Designated heritage assets

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

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

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.

Conservation Areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. 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.

The Council 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;*
- g. resist development outside of a conservation area that causes harm to the character of appearance of that conservation area; and*
- h. preserves 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...”*

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

i. resist the total or substantial demolition of a listed building;

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

k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Other Material Considerations

National Planning Policy Guidance (NPPG)

National Planning Practice Guidance (NPPG) 2019 has been issued by the Government as a web based resource and living document. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

The NPPG 2019 helps to define some of the key heritage terms used in the NPPF. With regard to substantial harm, it is outlined that in general terms this is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest. Optimum viable use is defined in the NPPG as the viable use likely to cause the least harm to the significance of the heritage asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

Public benefits are also defined in the NPPG 2014, as anything that delivers economic, social and environmental progress as described in the NPPF 2018. Public benefits should flow from the proposed development, and they may include heritage benefits.

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2018

The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paras. 16 and 17, as below:

"16. The Secretary of State uses the following criteria when assessing whether a building is of special architectural or historic interest and therefore should be added to the statutory list:

Architectural Interest: To be of special architectural interest a building must be of importance in its design, decoration or craftsmanship. Special interest may also apply to particularly significant examples of building types or techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms. Engineering and technological interest can be an important consideration for some buildings. For more recent buildings in particular, the functioning of the building (to the extent that this reflects on its original design and planned use, where known) will also be a consideration.

Artistic distinction can also be a factor relevant to the architectural interest of buildings and objects and structures fixed to them.

Historic Interest: To be able to justify special historic interest a building must illustrate important aspects of the nation's history and / or have closely substantiated historical associations with nationally important individuals, groups or events; and the building itself in its current form will afford a strong connection with the valued aspect of history.

17. When making a listing decision, the Secretary of State may also take into account:

Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.

Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area."

In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been published by Historic England in 2017. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type.

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

GPA Note 2 provides information to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, and marketing. It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

- 1. Understand the significance of the affected assets;*
- 2. Understand the impact of the proposal on that significance;*
- 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;*

4. *Look for opportunities to better reveal or enhance significance;*
5. *Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;*
6. *Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.*

With particular regard to design and local distinctiveness, advice sets out that both the NPPF and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place*
- *The relationship of the proposal to its specific site*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size*
- *The size and density of the proposal related to that of the existing and neighbouring uses*
- *Landmarks and other built or landscape features which are key to a sense of place*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*
- *The topography*
- *Views into, through and from the site and its surroundings*
- *Landscape design*
- *The current and historic uses in the area and the urban grain*
- *The quality of the materials*

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

This advice note provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone. This covers different types of heritage assets, including buildings and other structures; standing remains including earthworks; buried remains and marine sites; as well as larger heritage assets including conservation areas, registered landscapes, and World Heritage Sites.

London Borough of Camden: Camden Planning Guidance, Design, 2019

This Guidance has been designed to support the policies in the Camden Local Plan 2017. It is therefore consistent with the Local Plan and forms a Supplementary Planning Document SPD. The Camden Planning Guidance covers a range of topics, for the purpose of this report Section 3 (Heritage) has been the focus, and so all of the sections should be read in conjunction and within the context of Camden's Local Plan. Camden has a rich architectural heritage and Section 3 (Heritage) aims to preserve, and where possible, enhance these areas and buildings. It notes that most works to alter a listed building are likely to require listed building consent. The section also recognises that historic buildings can and should address sustainability and accessibility and that heritage assets play an important role in the health and wellbeing of communities.

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