

**20-24 Kirby Street**  
London EC1N 8TS

**Townscape, Heritage And Visual Impact Assessment**



November 2022

Consultancy for the  
Historic Built Environment

**KMH**Heritage

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## 1 Introduction

- 1.1 This report has been prepared to support a planning application for proposals affecting 20-24 Kirby Street, London EC1N 8TS. The report has been prepared by KMHeritage for Morgan Capital.
- 1.2 The proposed development is for the refurbishment and extension of the existing office building to create high-quality, modern and sustainable workspace.

### Purpose

- 1.3 The purpose of the report is to assess the proposed development against national and local policies and guidance relating to the historic built environment and for architectural and urban design.
- 1.4 This report should be read in conjunction with the drawings and Design & Access Statement prepared by DLA Architecture, and other application documents, in particular the Planning Statement prepared by DP9.

### Background

- 1.5 KMHeritage prepared a Townscape, Heritage And Visual Impact Assessment that supported planning application ref. 2021/4482/P, registered by the London Borough of Camden on 5 November 2021 following a pre-application process in the course of that year. The application sought planning permission for:

*Demolition of existing fifth floor; erection of two additional storeys to create additional office floorspace; creation of affordable jewellery space at lower ground floor level; internal and external alterations, plant and other associated works.*

- 1.6 Since the submission of the planning application in 2021, post-submission discussions have occurred and the design of the proposed development has changed.
- 1.7 This report therefore assesses the updated design in terms of its heritage and townscape effects. For convenience,

our previous report is repeated in full, including a description of baseline conditions, etc, but focusses on considering the changes to the scheme from the submitted version.

### **Organisation**

- 1.8 This introduction is followed in Section 2 by a description of the history of the site. Section 3 analyses the heritage and townscape significance of the site and its context. Section 4 sets out the national and local policy and guidance relating to the built environment that is relevant to this matter. An analysis is provided in Section 5 of the proposed development and its effect in heritage and townscape terms. Section 6 examines the proposal in terms of policy and guidance, and Section 7 is a summary and conclusion.

### **Author**

- 1.9 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. Kevin was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect and has a specialist qualification in urban and building conservation.
- 1.10 Drafting and research was carried out by Anne Roache MA MSc DipFEcol. Anne has over 25 years' experience working for leading commercial organizations in the fields of property, planning and law and has a specialism in the architectural and social history of London.

## 2 The site and its context

### The site: 20-24 Kirby Street

- 2.1 The site is located within the Holborn district of the London Borough of Camden, in the area known as Hatton Garden. Hatton Garden is a street which runs north-south between the major thoroughfares of Clerkenwell Road to the north and Charterhouse Street (leading to High Holborn)<sup>1</sup> to the south, forming central spine off of which minor streets run (Figure 1). Gray's Inn Road is its western boundary and Farringdon Road to the east forms the boundary with the London Borough of Islington.
- 2.2 No. 20-24 Kirby Street is a ground, plus 4 storey office building with rooftop plant extension, built in the post-war period.

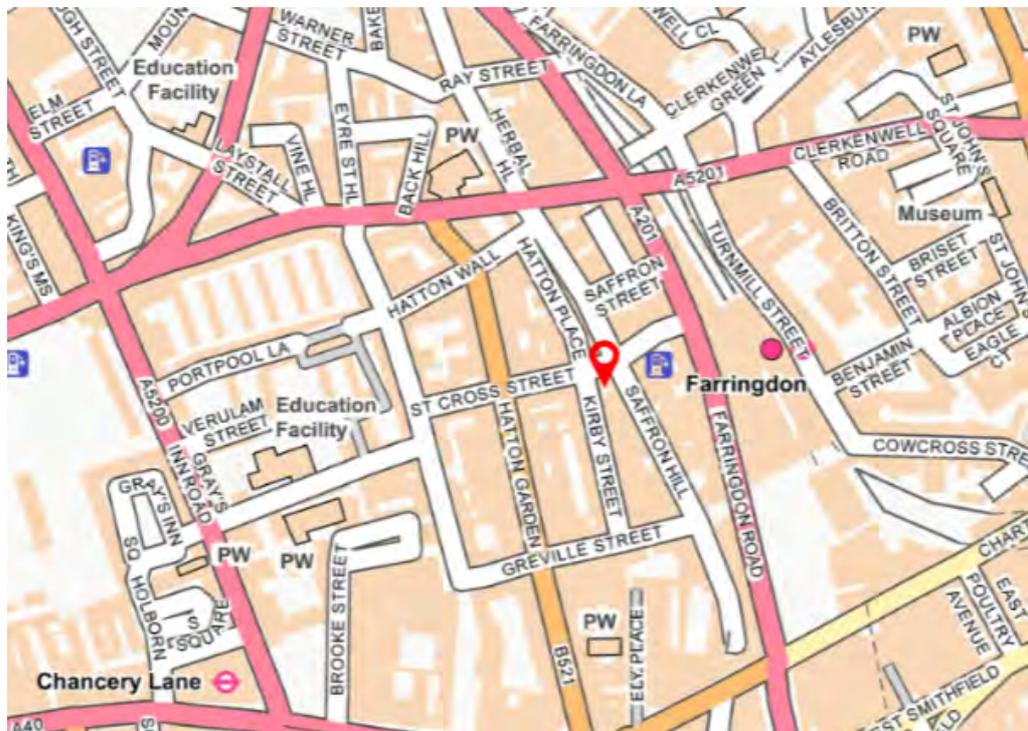


Figure 1: Kirby Street context (site pinned)

<sup>1</sup> Forming the boundary with the City of London.

## Historical development

### *A brief history of Hatton Garden*

- 2.3 High Holborn formed a part of the Roman route leading west from the walled City of London. The River Fleet, aligned roughly with present-day Farringdon Road but this fast flowing tributary of the Thames had, by the early 19th century, become an open sewer and so it was culverted beneath the streets. The Fleet valley can be discerned through the area's distinctive topography, evidenced in the steep streets of Greville Street, Back Hill and Herbal Hill.
- 2.4 The area around today's Hatton Garden had an association with metalworking from at least the 10th century, with nearby Fetter Lane being home to armourers working for the Knights Templar, and the district became home to a skilled community of craftsmen which came to be known for fine metalworking and jewellery making.
- 2.5 From the 14th century, the area was also a centre of the legal profession being convenient for Lincoln's Inn as well as Chancery Lane which links High Holborn to Temple. The surviving 16th century timber-framed façade of Staple Inn on High Holborn bears witness to this early period. Gray's Inn, which lies to the west of Hatton Garden, is the smallest of London's four 'Inns of Court'.
- 2.6 High Holborn remained an important thoroughfare linking the City of London with Oxford Street which was a key road out to West, lined with Inns and large residences, including the Bishop of Ely's Palace whose 13th century foundation is commemorated in Ely Place. In 1581, Sir Christopher Hatton, sometime Lord Chancellor, was gifted the property of Ely Place, by Elizabeth I, featuring a renowned garden it was to give the area its name of 'Hatton Garden'.

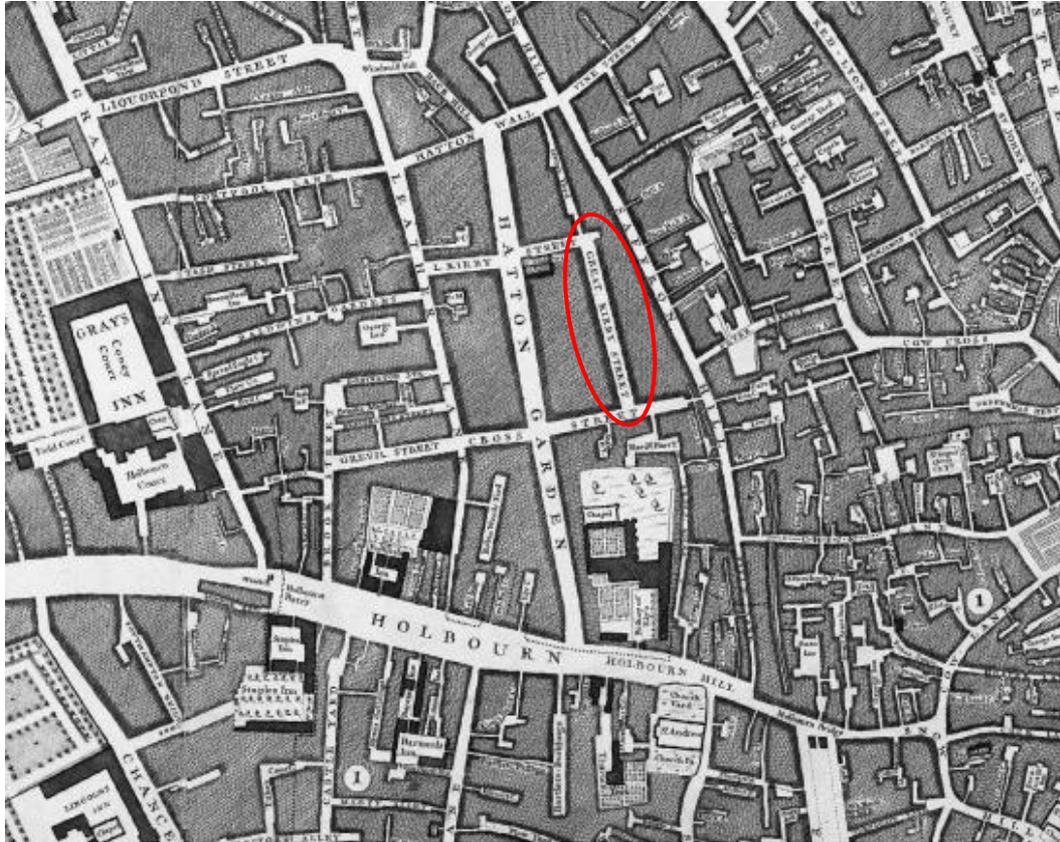


Figure 2: Extract from John Rocque's map of 1746 showing Hatton Garden running north from 'Holbourn' and the Bishop of Ely's Palace and garden to its east. Kirby Street circled

- 2.7 During the 19th century Hatton Garden built upon and further developed its reputation for fine metalworking and high quality jewellery with nearby Clerkenwell being the centre of the allied trade of precision clock and watch making. Printing was also a key trade and metal workers sullied type for Fleet Street. The area east of Farringdon Road was focused on Smithfield Market, London's premier wholesale meat and allied products market, dominated by a large metal-framed central market building and served by the extensive railway sidings.
- 2.8 Interspersed between the small houses, often used for both work and living quarters, were the churches, schools and public houses which served the community. The

Roman Catholic Church of St Etheldreda,<sup>2</sup> on the former Bishop of Ely's property, had managed somehow to survive the reformation.

- 2.9 Despite its success as a commercial centre, by the middle of the 19th century, the physical environs of Hatton Garden had become degraded as a result of the noxious processes of metal and glass working as well as being close to the abattoirs and effluence of Smithfield market; all of which had contributed to the Fleet River long having become a polluted, open sewer. Although by the time of his writing of 'Oliver Twist' in 1837, the lower half of the Fleet had been culverted over and developed as 'Farringdon Street'; Charles Dickens describes Fagin's den on Saffron Hill as "*a dirty and more wretched place he [Oliver] had never seen. The street was very narrow and muddy, and the air was impregnated with filthy odours*".
- 2.10 Further road widening schemes during the following decades, along with improvements in municipal sanitary provision, contributed to the clearance of the narrow lanes and courts which had developed into slums.
- 2.11 The former Ely estate had been given the status of a 'Liberty' or 'civil parish' an administrative assignation which kept it outside of local parish control. The combined Liberties of 'Saffron Hill, Hatton Garden, Ely Rents and Ely Place' occupied an area of 30 acres. In 1831 the Liberties reached a peak population of 9,745 persons however this was to fall rapidly from the late 19th century and by 1921 it was just 825. The Liberties fell under Holborn District Council from 1855 but became part of the Metropolitan Borough of Holborn in 1900.<sup>3</sup> Civil parish status was abolished in 1930.<sup>4</sup>
- 2.12 Little change was experienced in the built townscape until the 1940s when heavy bombing during the Blitz of the

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<sup>2</sup> Listed GI. It is one of two surviving buildings in London from the reign of Edward I (1272–1307) although it suffered bomb damage in Second World War.

<sup>3</sup> The Metropolitan Borough became the LB of Camden in 1965.

<sup>4</sup> Vision of Britain, Online: <https://www.visionofbritain.org.uk/unit/10183789>

Second World War destroyed or gutted many of the buildings in the area, resulting in extensive rebuilding during the post-war period.

- 2.13 In common with other, similar parts of inner London (such as Bermondsey) where manufacturing workshops had persisted into the early 20th century, the post-war period saw a profound change in the way that commercial space was used and older buildings adapted. Manufacturers, printers and light industry increasingly relocated to the outer suburbs into purpose built premises more suited to modern methods of production. Others simply fell victim to cheaper overseas imports and closed-up altogether.
- 2.14 Some of the older Farringdon and Hatton Garden buildings, particularly the handsome, multi-storey, Venetian Gothic warehouses, were converted into offices or residential use. Elsewhere, sites were cleared and new mid-rise offices were erected. Clearances continued until the late 1980s when the bomb damaged former Great Northern Railway Goods Station on the east side of Farringdon Road was finally demolished and replaced by two large footprint office blocks.
- 2.15 The area remains a busy commercial and retail centre, buoyed by a refreshed Farringdon station, which will be part of the new Crossrail service. Hatton Garden remains an internationally renowned centre of the jewellery, and especially, diamond trade.

#### *Kirby Steet*

- 2.16 Kirby Street takes its name from John de Kirkeby who purchased an estate here 1280. Appointed Bishop of Ely in 1286, on his death in 1290, he left the estate to the See of Ely.<sup>5</sup>
- 2.17 Under the auspices of the Hatton estate, Kirby Street was part of the early development of the Hatton Garden area, shown as 'Great Kirby Street' on Rocque's map of 1756

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<sup>5</sup> Richardson, J., 2000, The Annals of London.

(Figure 2). The estate was sold to the Crown in 1772 and the Bishop of Ely's Palace and grounds was redeveloped creating the cul-de-sac Ely Place lined with large, terraced houses (1772, Robert Taylor). Horwood's map (1792-9) shows these changes and with a street pattern and naming starting to settle into one which is recognisable today (Figure 3).



Figure 3: Extract from Horwood's Plan (1792-9). Kirby Street circled

2.18 The second half of the 19th century saw the area become increasingly commercial. The OS map of 1896 shows how the small houses of the 18th century and earlier had begun to be replaced by larger purpose built premises given over to warehousing and workshops supporting light industrial and manufacturing businesses. This is

noticeable on Kirby Street which now has a large printing works at its southern end (Figure 4<sup>6</sup>).



Figure 4: Kirby Street environs, extract from OS 1896

2.19 The Goad plan of 1887 show the floorplans and the building usage much more clearly (figs. 5 & 6<sup>7</sup>). All along Kirby Street are a variety of manufacturers associated with the jewellery, timepiece and metalwork trade including: diamond polishers, metal workers and polishers, glass cutters and glass blowers, manufacturing opticians, engravers and electro-platers as well as wood turners, printers and bookbinders. All of these premises had extensions covering formerly open yards, many lit from above by skylights, back-to-back with workshops on parallel streets.

<sup>6</sup> OS London 1:1,056 - Sheet VII.54. Publication date: 1896.

<sup>7</sup> Goad Insurance Plan of London Vol. VI: sheet 126 1887.

2.20 The site of the present 20-24 was occupied by two separate premises. The premises giving onto St Cross Street and Kirby Street was a 'fancy box factory' and on that facing onto Saffron Hill was a 'printer's and engineer' premises. Both had footprints that indicated the sites were amalgamations of several smaller sites.

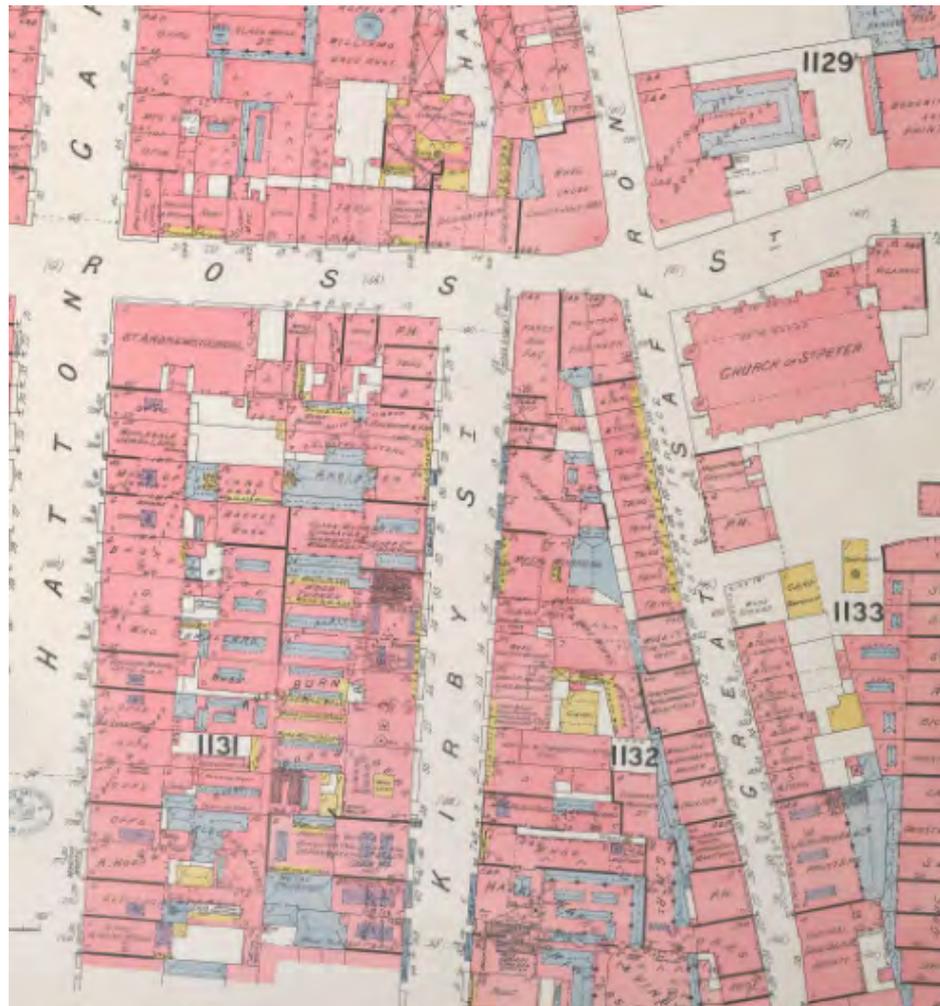


Figure 5: Goad insurance plan 1887, extract showing Kirby Street and environs

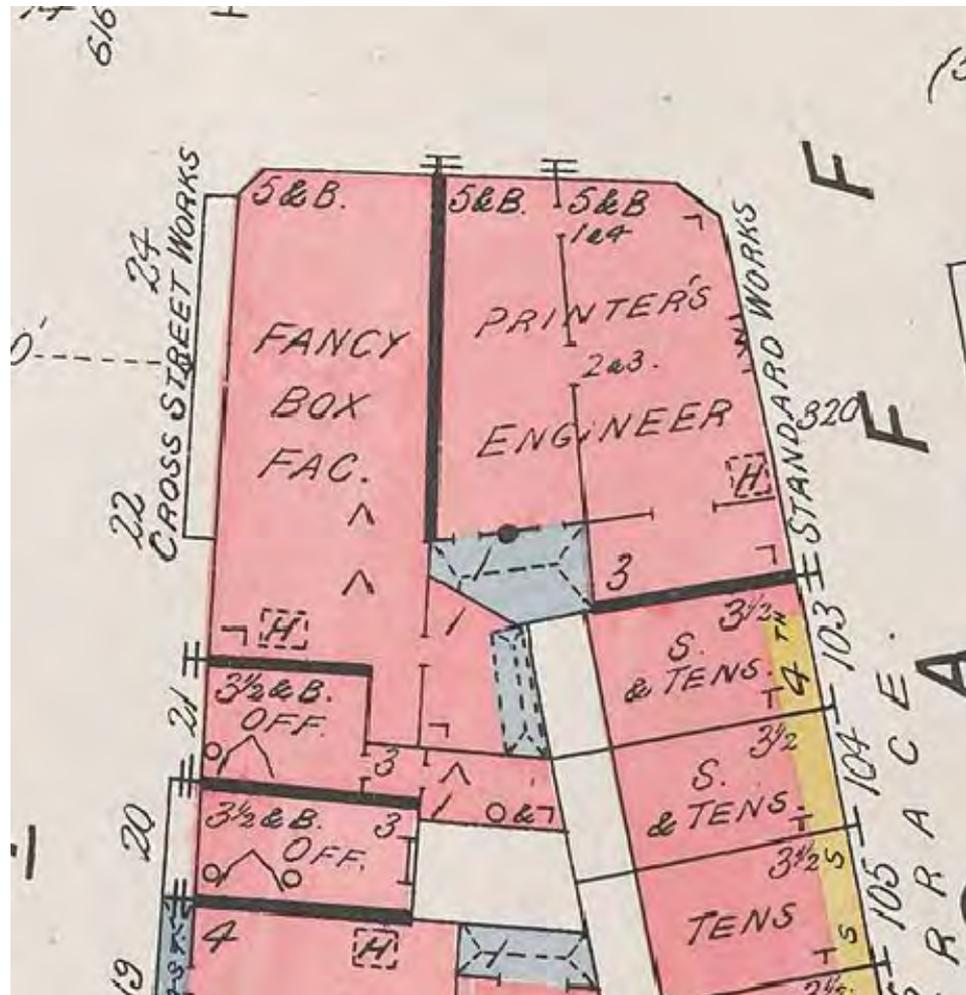


Figure 6: Goad Insurance Plan 1887, detail of present site

- 2.21 The site persisted in its later 19th century form until the 1940s when heavy bombing during the Blitz of the Second World War destroyed many of the buildings in the area resulting in extensive rebuilding during the post-war period.
- 2.22 The LCC Bomb Damage maps and an aerial photograph from 1947 illustrate this devastation very clearly (figs.7<sup>8</sup>, 8<sup>9</sup> & 9).

<sup>8</sup> © Layers Of London

<sup>9</sup> © Historic England EAW011205 Hatton Gardens and environs, Holborn, 1947, Britain from Above



Figure 7: Extract from LCC Bomb Damage maps showing most of Kirby Street destroyed by bombing (black colouring)



Figure 8: Kirby Street, 1947



Figure 9: Extract from OS 1940s

- 2.23 In common with other parts of inner London, where manufacturing workshops had persisted into the early 20th century, the post-war period saw a profound change in the way that commercial space was used and adapted in and around the Hatton Garden/Farringdon area. Manufacturers, printers and light industry increasingly relocated to the outer suburbs into purpose built premises. Others simply fell victim to cheaper overseas imports and closed-up altogether.
- 2.24 New office space was one way to utilise these vacated brownfield sites, and as Britain's service industries came to the fore, the bombed and cleared site at the north end of Kirby Street was redeveloped to provide a new office building.
- 2.25 Constructed in the post-war period, the building has extensive glazing to allow the maximum amount of natural light into the interiors. The gridded elevational design varies slightly on each of the three street-facing sides. The metal-framed fenestration is broken up on the

St Cross Street elevation by vertical concrete piers between the glazing, whilst wide, contrasting, pre-cast concrete panels forming horizontal banding relieves the Saffron Hill and St Cross Street façades. Red brick characterises the Kirby Street elevation.

### 3 The heritage and townscape significance of the site and its context

#### Introduction

3.1 This section of the report describes the heritage and townscape significance of the site and its surroundings.

#### Heritage assets

3.2 The heritage context of the site has been established through a search of the Greater London Historic Environment Record (GLHER), the National Heritage List for England and online resources provided the London Borough of Camden (Figure 10<sup>10</sup>).

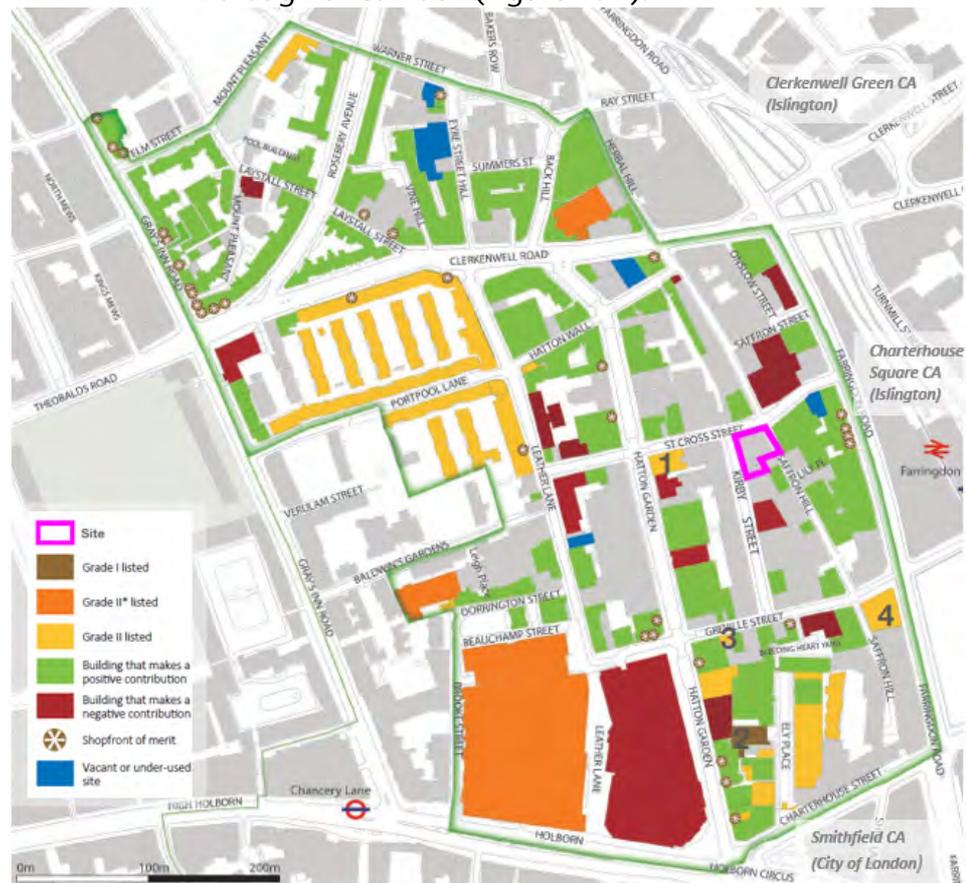


Figure 10: Site context: conservation areas and listed buildings

<sup>10</sup> Based on map within Hatton Garden Conservation Area Appraisal and Management Strategy, LB Camden, August 2017.

*Conservation area*

- 3.3 No. 20-24 Kirby Street is located within the Hatton Garden Conservation Area, in the London Borough of Camden (Appendix A). The conservation area was first designated in 1999 and the revised Hatton Garden Conservation Area Appraisal and Management Strategy was adopted in August 2017.
- 3.4 The conservation area covers approximately 20 hectares. Its character derives largely from its, intricate street pattern of narrow lanes, courts and streets overlaid on the unusually hilly topography; a reminder of its location in the valley of the former River Fleet. These features combine to give a strong feeling of enclosure with very few long views. Within this grid are many tall and robustly detailed late 19th century tall brick warehouse and showroom buildings, many in the highly decorated Venetian Gothic style, interspersed with smaller, plain stock brick residential buildings dating from the 18th and early 19th centuries. These, in their turn, contrast with post-war infill commercial buildings.
- 3.5 Although no single period, style or use predominates, it is the area's historical manufacturing and workshop character that pervades - a direct line from the Medieval metal workers who first established their workshops here to the internationally renowned jewellery quarter of today - focused along the spine of Hatton Garden and its side streets.
- 3.6 The site lies within Sub-area 3 and is described in Conservation Area Appraisal as comprising *'the grid of streets laid out by Christopher Hatton in 1659 and the adjacent enclaves of Brooke's Market and Ely Place. 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 or 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.'*

- 3.7 Nearby, two conservation areas lie to the east of Farringdon Road, both in the LB of Islington; these are Charterhouse Square CA and Clerkenwell Green CA. To the south is the Smithfield CA, part of the City of London.

#### *Listed buildings*

- 3.8 The site is not statutorily listed. There are four individual, or groups of, listed buildings within c.150m of the site, all of which are listed Grade II. These are:
- Farringdon Road: 25 & 27;
  - Greville Street: 10 & 11;
  - Hatton Garden: St Andrew's Parochial Schools Wren House and attached railings (No. 43); No. 31.

#### **Strategic views**

- 3.9 The site sits beneath two London View Management Framework Protected Vistas: 2A.1 from Parliament Hill to St Paul's Cathedral and 3A.1 from Kenwood to St Paul's Cathedral. The threshold plane for both lies 22.5 metres above the existing roof level in respect of LVMF 2A.1 and 23.2 metres above in respect of LVMF 3A.1. The proposed development will remain beneath these threshold planes.

#### **The heritage and townscape significance of 20-24 Kirby Street and its context**

##### *Heritage significance: concepts and terminology*

- 3.10 The listed buildings in the vicinity of 20-24 Kirby Street, as well as the Hatton Garden Conservation Area are 'designated heritage assets', as defined by the National

Planning Policy Framework (NPPF). Locally listed buildings are ‘non-designated heritage assets’. Buildings that make a positive contribution to a conservation area can also be considered as non-designated heritage assets.

3.11 Heritage ‘significance’ is defined in the NPPF 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’. The Historic England ‘Historic Environment Good Practice Advice in Planning Note 2’ puts it slightly differently – as ‘the sum of its architectural, historic, artistic or archaeological interest’.

3.12 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, April 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.

*Heritage and townscape significance*

3.13 20-24 Kirby Street, the listed and unlisted buildings nearby and their relationship to one another and the conservation area collectively illustrate the development of this part of London. Historical value is described as being illustrative or associative. The story of 20-24 Kirby Street illustrates a good deal about how London evolved from the medieval period to the present and about social change and lifestyles in that period.

3.14 In terms of Historic England’s ‘Conservation Principles’ the building provides us with ‘evidence about past human activity’ and by means of its fabric, design and appearance communicates information about its past. The building does this not just through its physical fabric, but also through its uses and its relationship with the wider conservation area.

3.15 20-24 Kirby Street has some minor historic and evidential value as an illustration of the post-war redevelopment of the Farringdon and Hatton Garden area.

- 3.16 20-24 Kirby Street is located within a historic grid which, between Hatton Garden and Farringdon Road, consists of large urban blocks, elongated in a north-south orientation, separated by tall and relatively narrow streets. Views along these streets are linear and constrained. There are few broad vistas. The only notable role played by 20-24 Kirby Street in urban terms is its termination of the block bounded by Kirby Street, St Cross Street, Saffron Hill and Greville Street.
- 3.17 It is clear that 20-24 Kirby Street has only very modest 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'. What architectural interest 20-24 Kirby Street possesses derives specifically from its generic architectural design and its external appearance. Stylistically, it is an example of a common form of mid-rise, post-war office block and is not in any way a notable example of that typology. The building makes a neutral contribution to the wider townscape of the Hatton Garden Conservation Area.

## 4 The legislative, policy and guidance context

### Introduction

- 4.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.
- 4.2 Section 6 demonstrates how the proposed development complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 6: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surrounding, and in reaching conclusions about the effect of the proposed development.

### The Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act').
- 4.4 Section 16(2) says that 'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'
- 4.5 Section 66(1) of the Act says 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 exercise of any features of special architectural or historic interest which it possesses'.
- 4.6 Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation

area to pay ‘special attention... to the desirability of preserving or enhancing the character or appearance of that area’.

### **The National Planning Policy Framework**

- 4.7 The National Planning Policy Framework was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. The revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019.

<sup>11</sup>.

#### *Design*

- 4.8 Chapter 12. of the National Planning Policy Framework deals with design: Achieving well-designed places. It begins:

*‘The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process’ (paragraph 126).’*

- 4.9 Paragraph 130 sets out a series of expectations regarding design quality and advises that ‘planning policies and decisions should ensure that developments:

*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

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<sup>11</sup> Ministry of Housing, Communities & Local Government (2019). Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*

#### *Proposals affecting heritage assets*

- 4.10 Chapter 16 of the National Planning Policy Framework: 'Conserving and enhancing the historic environment' deals with Heritage Assets describing them as 'an irreplaceable resource' that '*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*' (paragraph 189).<sup>12</sup>
- 4.11 Paragraphs 190-193 discuss the responsibilities of the local authority towards plan making and the historic environment.

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<sup>12</sup> The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

- 4.12 Paragraph 194 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says that:
- ‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’*
- 4.13 In terms of the local authority, paragraph 195 requires that they:
- ‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.’*
- 4.14 Further: *‘where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision’* (paragraph 196).
- 4.15 Paragraph 197 says that *‘In determining applications, local planning authorities should take account of:*
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
  - c) the desirability of new development making a positive contribution to local character and distinctiveness.’*

*Considering potential impacts*

- 4.16 Paragraph 199 advises local planning authorities that *‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’*
- 4.17 Paragraph 200 continues: *‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’*<sup>13</sup>
- 4.18 In terms of proposed development that will lead to substantial harm to (or total loss of significance of) a designated heritage asset, paragraph 201 states that *‘local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- (a) the nature of the heritage asset prevents all reasonable uses of the site; and*
  - (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

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<sup>13</sup> Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

*(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.'*

- 4.19 It continues *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'* (paragraph 202).
- 4.20 In considering the effect of an application on the significance of a non-designated heritage asset the local authority should employ a 'balanced judgement' in regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 203).
- 4.21 Paragraph 204 requires that *'Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred'* (paragraph 204).
- 4.22 Where a heritage asset is to be lost, the developer will be required to *'record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'* (paragraph 205).<sup>14</sup>
- 4.23 In terms of development within the setting of heritage assets, paragraph 206, advises that *'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to*

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<sup>14</sup> Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

*the asset (or which better reveal its significance) should be treated favourably’ (paragraph 206).*

- 4.24 It goes on however that *‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage site as a whole’ (paragraph 207).*
- 4.25 Finally, paragraph 208 requires that the onus will be on local planning authorities to *‘assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies’.*
- 4.26 The setting of a heritage asset is defined in the NPPF 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’.*<sup>15</sup>

#### **Planning Practice Guidance**

- 4.27 Planning Practice Guidance<sup>16</sup> provides streamlined guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the

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<sup>15</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

<sup>16</sup> Ministry of Housing, Communities & Local Government (2019). Revised National Planning Policy Framework. Online: [www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment](http://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment).

section entitled ‘Conserving and Enhancing the Historic Environment’ which gives advice under the following headings:

- Overview: historic environment
- Plan making: historic environment
- Decision-taking: historic environment
- Designated heritage assets
- Non-designated heritage assets
- Heritage Consent Processes and
- Consultation and notification requirements for heritage related applications.

4.28 The Government published an updated Historic Environment section of PPG on 23 July 2019 to reflect the changes made to the National Planning Policy Framework (NPPF) since the 2012 edition.

#### **Historic England’s Planning Advice<sup>17</sup>**

##### *Good Practice Advice*

4.29 Historic England provide guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. This provides ‘information on good practice 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 national Planning Practice Guide (PPG)’.

4.30 These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);

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<sup>17</sup> Historic England, *The Planning System*, Online: [historicengland.org.uk/advice/planning/planning-system](https://historicengland.org.uk/advice/planning/planning-system)

- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017);
- GPA 4: Enabling development and heritage assets (2020).

*GPA 3: The Setting of Heritage Assets*

- 4.31 This provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. The guidance echoes the definition of ‘setting’ in the NPPF 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*’.<sup>18</sup>
- 4.32 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed development on that significance. The document then sets out how the step-by-step methodology is used and considers each step in more detail.

*Historic England Advice Notes (HEAN)*

- 4.33 These advice notes covering various planning topics in more detail and at a more practical level. They have been prepared by Historic England following public consultation.
- 4.34 The document most relevant to the proposed development is
- HEAN 1 - Conservation Areas.

*Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*

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<sup>18</sup> NPPF Glossary

- 4.35 This document<sup>19</sup> has been referred to in Section 2 of this report. It describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value. The conservation area, listed buildings and locally listed buildings have evident special architectural and historic interest. Any proposals for the site must have regard for the preservation of this special interest.

#### **The London Plan**

- 4.36 The London Plan 2021 was adopted in March 2021. It is the overall strategic plan for London, and sets out an integrated economic, environmental, transport and social framework for the development of the city over the next 20-25 years
- 4.37 Chapter 3 ‘Design’ deals with overarching themes in relation to design in the built environment and provides a range of policies concerning the design of new development in London.
- 4.38 Policy D3 ‘Optimising site capacity through the design-led approach’ requires that development proposals should *‘enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.’* Further that proposals should *‘respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.’* Policy D4 ‘Delivering good design’ expounds upon the procedures which will be used to oversee this ambition.
- 4.39 Policy D9 deals with ‘Tall Buildings’ and how their impacts should be assessed and addressed.

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<sup>19</sup> English Heritage (2008) *Conservation principles, policies and guidance for the sustainable management of the historic environment.*

- 4.40 Section C (1) requires that development proposals address 'Visual Impacts' as follows:
- a) *the views of buildings from different distances:*
    - i. *long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views*
    - ii. *mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality*
    - iii. *immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*  - b) *whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding*
  - c) *architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan*
  - d) *proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area*

*e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it*

*f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river g) buildings should not cause adverse reflected glare*

*h) buildings should be designed to minimise light pollution from internal and external lighting.'*

4.41 Chapter 7 'Heritage and Culture' defines 'Heritage significance' (para 7.1.7) as

*'the archaeological, architectural, artistic or historic interest of a heritage asset. This may can be represented in many ways, in an asset's visual attributes, such as - form, scale, materials, and architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets.'* It goes on to say that *'development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form'.*

4.42 In terms of development proposals, Policy HC1 'Heritage conservation and growth', says that:

*'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.'*

### **Camden Local Plan**

4.43 The London Borough of Camden adopted its Local Plan in July 2017. The Plan sets out the Council's planning policies. It replaces Camden's Core Strategy and Development Policies planning documents (adopted in 2010).

4.44 Section 7 of the Plan deals with Design and Heritage saying that 'the Council places great importance on preserving the historic environment'.

4.45 Policy D1 Design says 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.'*

4.46 Policy D1 also addresses Tall Buildings, Public Art and Excellence in Design.

4.47 Policy D2 Heritage deals with Camden's heritage assets. The policy says that:

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

4.48 In relation to designated heritage assets generally the policy says:

*'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.'*

4.49 The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm'.

4.50 In relation to Conservation Areas the policy says:

*'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 or appearance of that conservation area; and*

*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.'*

4.51 In relation to Listed Buildings the policy says:

*'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.'*

4.52 In relation to Archaeology:

*'The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.'*

4.53 In relation to other heritage assets and non-designated heritage assets including those on and off the local list, Registered Parks and Gardens and London Squares the policy states:

*'The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.'*

*Camden Planning Guidance: Design*

4.54 Updated guidance (CPG) relating to 'Design' was published in January 2021. In regard to Heritage, this sets out that:

*'The Council will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset/s affected.*

*We will take account of:*

- The desirability of sustaining and enhancing the significance of any heritage asset/s and putting them to viable uses consistent with their conservation;*
- The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing;*

*· The desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness.*

*Applicants - will need to show how the significance of a heritage asset, including any contribution made by their setting, has been taken into consideration in the design of the proposed works. The level of detail required will be proportionate to the asset/s importance and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset/s affected.'*

## 5 The proposed development and its effect

### Introduction and background

- 5.1 This section of the report assesses the proposed development and its effect on the heritage and townscape significance described earlier in this report. The proposed development is illustrated in the drawings and Design & Access Statement prepared by DLA Architecture.
- 5.2 KMHeritage prepared a Townscape, Heritage And Visual Impact Assessment in respect of proposals for this site that supported planning application ref. 2021/4482/P, registered by the London Borough of Camden on 5 November 2021 following a pre-application process in the course of that year. The application sought planning permission for:
- Demolition of existing fifth floor; erection of two additional storeys to create additional office floorspace; creation of affordable jewellery space at lower ground floor level; internal and external alterations, plant and other associated works.*
- 5.3 The proposed development was the subject of detailed pre-application discussions with the London Borough of Camden in respect of the proposals, and the design of the proposal evolved accordingly; this was set out in the submission Design & Access Statement.
- 5.4 Since the submission of the planning application in 2021, post-submissions discussions have occurred and the design of the proposed development has changed.
- 5.5 This section of the report therefore assesses the updated design in terms of its heritage and townscape effects.

### Purpose of the proposed development

- 5.6 The proposed development is for the refurbishment and extension of the existing office building to create high-quality, modern and sustainable workspace. The aim is straightforward – to improve the amount and quality of dated and inefficient employment space by means of a

sensitive and imaginative architectural scheme, so as to provide modern facilities and to enhance the building's appearance for the long term.

**The changes to the November 2021 submitted scheme.**

5.7 Following the post-submission discussions referred to above, the following amendments to the submitted 2021 scheme proposed were:

- Omission of a sixth floor office accommodation;
- Provision of a fifth floor that sits in line with the existing building footprint;
- Use of harmonious materials across the extension and host building;
- Relocated core to the south of the building footprint;
- A single set back enclosure on level six for roof plant only;
- Omission of a roof terrace; and
- Provision of a small cut-out terrace on the fifth floor facing Saffron Hill.

5.8 Further feedback from officers suggested the following further amendments:

- Reduction in the scale and amount of the top floor fenestration so as to make it more subordinate and horizontal in emphasis;
- Omission of the cut-out balcony on Saffron Hill;
- Integration of the plant with the overall design;
- Ensuring that the extension is, by means of the adjustments suggested, appears more subordinate; and

- Improving the activation and visual interest of the ground floor level affordable jewellery space.

### **The proposed development**

- 5.9 The works will include infilling of the central void and relocation of the core and a single additional floor extension to create more rational and efficient floorplates and to optimise the provision of office space. The resultant workspace will benefit from improved natural light. Alterations to the facades, including window replacement, will enhance its appearance within the Hatton Garden Conservation Area. The proposed development will create a more sustainable building than exists at present.
- 5.10 The proposed development, as revised, is illustrated in a series of townscape views (Figures 11-16) on the following pages. The effect of the amended proposed development on heritage and townscape significance is considered in the next part of this section.



Figure 11: The proposed development, looking south along Saffron Hill



Figure 12: The proposed development, looking east along St Cross Street



Figure 13: The proposed development, looking north along Saffron Hill, outside Nos 110-115



Figure 14: The proposed development, looking north along Kirby Street, opposite Nos 6-10



Figure 15: The proposed development, looking north along Kirby Street near the junction with St Cross Street



Figure 16: The proposed development, looking west along St Cross Street

### **The effect of the proposed works on heritage and townscape significance**

- 5.11 The single notable effect of the amendments to the submitted scheme is to create a proposal that simply modifies the appearance of the existing building to a limited degree, as opposed to altering that appearance to any significant degree or to create a visibly different presence for 20-24 Kirby Street in the conservation area.
- 5.12 Our previous assessment was that the existing building is pedestrian and bland, and that remains our view. It does not have any architectural connection to its context and could be found anywhere. However, even the minimal changes proposed now, including the addition of an extra floor, will improve the overall appearance and utility of 20-24 Kirby Street. In so doing the development will have a positive effect upon the Hatton Garden Conservation Area. It will enhance the character and appearance of the conservation area, and the setting of the positive contributors adjacent to the site.
- 5.13 A reduced scheme inevitably involves reduced visual, heritage and townscape effects. Given the reduction in the alteration of the overall appearance of the building form that of the submitted scheme, it remains the case that there will be no meaningful effect upon the significance of any other heritage assets. The previous minimal alteration in the setting of the Grade II Wren House when viewed from the portion of St Cross Street to the west of Hatton Garden or east of Saffron Hill will be reduced; the effect on the setting of Wren House will be even less than that of the submitted scheme.
- 5.14 The proposed scheme remains – to an even greater degree than the submitted scheme - consistent with the scale, bulk and massing of the conservation area around it. The proposal for additional floors has been altered following submission of the planning application, and now just one additional and essentially matching floor is proposed – it appears as though it might have been part of the original design in design and material terms.

## Conclusion

- 5.15 The proposed scheme, as revised, provides clear public, townscape and heritage benefits, and will clearly preserve and enhance the character and appearance of the Hatton Garden Conservation Area and the setting of adjacent listed and locally listed buildings. It is clearly capable of satisfying statutory and policy tests in respect of architecture, urban design and heritage assets and the scheme will be discernible as an improvement in the quality and appearance of the site over the present situation.

## 6 Compliance with legislation, policy and guidance

### Introduction

- 6.1 This report has provided a detailed description and analysis of the significance of 20-24 Kirby Street and its heritage context. In addition, the report also describes (in Section 5 'The proposed development and its effect') how the proposed scheme will affect that heritage significance. The effect is positive, and for that reason, the scheme complies with policy and guidance.

### The Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed scheme for 20-24 Kirby Street preserves its interest as a listed building, the setting of other nearby listed buildings and the character and appearance of the Hatton Garden Conservation Area. The proposed scheme thus complies with Sections 14, 66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 6.3 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573 and is met if the proposed development leaves conservation areas unharmed. We believe that the proposed development leave the Hatton Garden Conservation Area unharmed, and indeed goes further and enhances the conservation area.

### The National Planning Policy Framework

#### *Design*

- 6.4 The proposed development is wholly consistent with Chapter 12 of the NPPF. It will clearly 'function well' and 'add to the overall quality of the area', will be 'visually

attractive’, is certainly related to its context and helps in place-making and reinforcing the existing urban context. In our opinion, the proposed development will ‘help raise the standard of design more generally in [the] area’ and will ‘fit in with the overall form and layout of [its] surroundings’.

*The level and nature of ‘harm’ caused by the proposed development*

- 6.5 Having concluded that the proposal will preserve and enhance the relevant designated heritage assets, we now consider whether harm – in the sense used by the National Planning Policy Framework – is caused to these heritage assets. As outlined in Section 4, the NPPF identifies two levels of potential ‘harm’ that might be caused to a heritage asset by a development: ‘substantial harm (or total loss of significance)’ or ‘less than substantial’ harm. Both levels of harm must be caused to a *designated* heritage asset – in this instance the Hatton Garden Conservation Area or nearby listed buildings.
- 6.6 The only potential for ‘substantial’ harm would be if the proposed development for the site caused the loss of something *central* to the special interest of this heritage asset. The proposal evidently does not give rise to this level of harm.
- 6.7 Similarly, we also do not believe that any ‘less than substantial harm’ to the conservation area is caused by the scheme. Our analysis of the proposed development, when considered in relation to legislation, policy and guidance, concludes that no harm is caused to special interest or significance. Change occurs to and in the setting of designated heritage assets, but this change is positive and the proposed development will enhance the building and the character and appearance of the Hatton Garden Conservation Area by virtue of its high quality design.

- 6.8 For the same reasons we do not believe that harm is caused (as per Paragraph 203 of the NPPF) to the non-designated heritage assets in the vicinity of the site.
- 6.9 In any event, the public and heritage benefits of the proposed development more than outweigh any low level of ‘less than substantial harm’ that *might* be asserted as being caused by the proposed development. It is clear that the proposed scheme represents, for the reasons set out in this report, in the Design & Access Statement and in the Planning Statement the opportunity to create greatly improved commercial space in a highly accessible location in Central London.

*Specific requirements of the NPPF*

- 6.10 This report has provided a detailed description and analysis of the significance of the site and its heritage context, as required by Paragraph 194 of the National Planning Policy Framework.
- 6.11 The proposal satisfies Paragraph 197 by allowing 20-24 Kirby Street to make an enhanced and sustainable contribution to the community and economic vitality of this part of the Hatton Garden Conservation Area.
- 6.12 The proposed development complies with Paragraph 199 of the NPPF in that it conserves the heritage assets affected. Special architectural or historic interest is preserved and no harm to heritage significance is caused. Paragraphs 200, 201, 202 and 203 of the National Planning Policy Framework are therefore not engaged in consideration of the proposed scheme.
- 6.13 The scheme clearly strikes the balance suggested by the NPPF – it intervenes in the heritage context of the site in a manner commensurate to its heritage significance. This balance of intervention versus significance is described in detail earlier.

### **Historic England guidance on the setting of heritage assets**

- 6.14 The step-by-step methodology provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3 is addressed as follows:
- Step 1: identify which heritage assets and their settings are affected:  
*This is done in Section 3 of this report.*
  - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s):  
*This is discussed in Section 3.*
  - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance:  
*This is undertaken in Sections 5 of this report.*
  - Step 4: explore the way to maximise enhancement and avoid or minimise harm:  
*This formed part of the design process and pre-application discussions with the local planning authority, and the design has evolved to respond to pre-application advice.*
  - Step 5: make and document the decision and monitor outcomes:  
*The submission documents, in particular the Design & Access Statement, and this report record the scheme as amended following design development prior to and during an application for planning permission being made.*

### **London Plan**

- 6.15 The proposed scheme is consistent with the London Plan and fully complies with its Design (Chapter 3) and Heritage (Chapter 7) policies.

- 6.16 The proposed scheme is of the highest architectural quality and responds to Policy D3 ‘Optimising site capacity through the design-led approach’ by positively responding to local distinctiveness and successfully responding to the existing character of the place and in that respects, enhances and utilises the heritage assets and architectural features that contribute towards the local character.
- 6.17 It is also consistent with Policy HC1 Heritage Conservation and Growth in that the applicants have sought to identify, understand and conserve the historic environment and the proposals clearly conserve the significance of nearby heritage assets, and their settings, by being ‘sympathetic to their significance and appreciation within their surroundings’.

#### **Camden Local Plan**

- 6.18 In positively addressing the requirements of the National Planning Policy Framework and the London Plan, the scheme also meets the policy requirements of Camden Local Plan policies and supplementary planning guidance for architecture, urban design and heritage assets.
- 6.19 It will clearly respect ‘local context and character’, preserve and enhance ‘the historic environment and heritage assets in accordance with Policy D2 ‘Heritage’, and ‘integrates well with the surrounding streets and open spaces [and .....] contributes positively to the street frontage’

## 7 Summary and conclusion

- 7.1 The purpose of the report is to assess the proposed development in respect of 20-24 Kirby Street against national and local policies and guidance relating to the historic built environment and for architectural and urban design.
- 7.2 The report describes the site and its surroundings as it is found at present. Section 2 sets out the history of the site and its surroundings and the development of the area. Section 3 identifies the heritage and townscape receptors in the vicinity, and assesses townscape and heritage significance. The proposed scheme and its effect is assessed in Section 5.
- 7.3 The proposed development is for the refurbishment and extension of the existing office building to create high-quality, modern and sustainable workspace. The aim is straightforward – to improve the amount and quality of dated and inefficient employment space by means of a sensitive and imaginative architectural scheme, so as to provide modern facilities and to enhance the building’s appearance for the long term.
- 7.4 KMHeritage prepared a Townscape, Heritage And Visual Impact Assessment in respect of proposals for this site that supported planning application ref. 2021/4482/P, registered by the London Borough of Camden on 5 November 2021 following a pre-application process in the course of that year. Since the submission of the planning application in 2021, post-submission discussions have occurred and the design of the proposed development has changed. This report therefore assesses the updated design in terms of its heritage and townscape effects.
- 7.5 The single notable effect of the amendments to the submitted scheme is to create a proposal that simply modifies the appearance of the existing building to a limited degree, as opposed to altering that appearance to

any significant degree or to create a visibly different presence for 20-24 Kirby Street in the conservation area.

- 7.6 A reduced scheme inevitably involves reduced visual, heritage and townscape effects. Given the reduction in the alteration of the overall appearance of the building form that of the submitted scheme, it remains the case that there will be no meaningful effect upon the significance of any other heritage assets. The previous minimal alteration in the setting of the Grade II Wren House when viewed from the portion of St Cross Street to the west of Hatton Garden or east of Saffron Hill will be reduced; the effect on the setting of Wren House will be even less than that of the submitted scheme.
- 7.7 The proposed scheme remains – to an even greater degree than the submitted scheme - consistent with the scale, bulk and massing of the conservation area around it. The proposal for additional floors has been altered following submission of the planning application, and now just one additional and essentially matching floor is proposed – it appears as though it might have been part of the original design in design and material terms.
- 7.8 The proposed scheme, as revised, provides clear public, townscape and heritage benefits, and will clearly preserve and enhance the character and appearance of the Hatton Garden Conservation Area and the setting of adjacent listed and locally listed buildings. The scheme will be discernible as an improvement in the quality and appearance of the site over the present situation.
- 7.9 Section 6 demonstrates how the proposed development will comply with legislative, policy and guidance. We believe that the development will preserve the setting of designated heritage assets, and it therefore complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. We also believe that the proposed scheme is consistent with the urban design and heritage policies of the National Planning Policy Framework, the London Plan and the London Borough of Camden’s Local Plan.

## Appendix A: Hatton Garden Conservation Area



Location of site (outlined in red)

KMHeritage

[mail@kmheritage.com](mailto:mail@kmheritage.com)

[www.kmheritage.com](http://www.kmheritage.com)

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