

Flat 13, Craig's Court  
25 Whitehall, London,  
SW1A 2BS

## Heritage Statement

Local Planning Authority: Westminster City Council

October 2023



Built Heritage  
Consultancy

# Flat 13, Craig's Court 25 Whitehall, London, SW1A 2BS

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# 1.0 Introduction

## 1.1 Instruction

This Heritage Statement has been produced by Built Heritage Consultancy to accompany an application for Listed Building Consent for internal alterations at Flat 13, Craig’s Court, 25 Whitehall, London, SW1A 2BS (the ‘Site’). The subject flat, the Site, is located on the third floor on part of Nos. 25 and 27 Whitehall.

This Heritage Statement will assess the significance of any on-site heritage assets and any in the surrounding area that might potentially be affected by the scheme proposals. It will also assess the potential heritage impacts on the identified heritage assets in light of the proposed scheme.

## 1.2. Scheme Proposals

The scheme comprises minor internal alterations to Flat 13 including refitting the kitchen, replacement of all secondary glazing and substitution of one bathroom doorway.

## 1.3. Structure of Report

**Section 2** identifies the heritage assets to assess as part of this Heritage Statement.

**Section 3** sets out the history of the locality.

**Section 4** sets out a map regression of the Site.

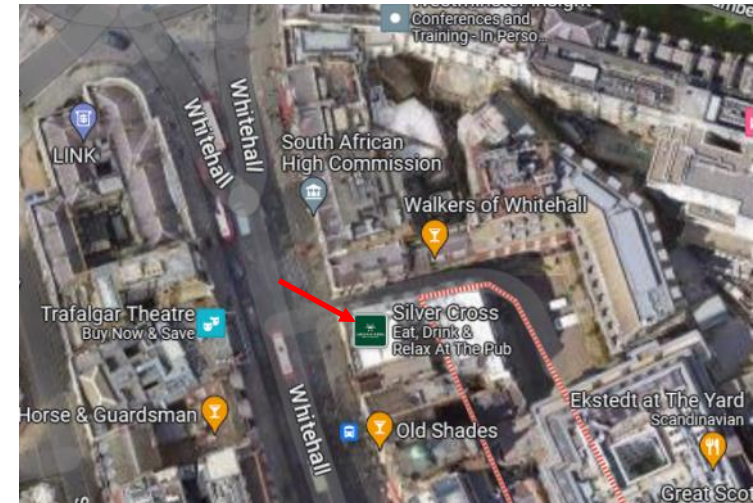
**Section 5** sets out our background understanding of the on-site heritage asset(s).

**Section 6** sets out the assessment of significance of the identified heritage assets.

**Section 7** provides an overview of the scheme proposals and an assessment of the potential heritage impacts.

**Section 8 sets out the summary and conclusions of this Heritage Statement.**

The Appendices include any relevant Historic England list entries, a summary of any legislation, policy and guidance relevant to the historic environment and a Bibliography for this Heritage Statement.



**Figure 1.1:** Aerial photograph with the approximate location of the Site marked in red (Source: Google Earth).



**Figure 1.2:** Location map with the approximate location of the Site marked in red (Source: Historic England).

## 2.0 Identification of Heritage Assets to Assess

### 2.1 Paragraph 194 of NPPF

Paragraph 194 of the NPPF states: *“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....”*

### 2.2 Identifying Significance

The NPPF (Annex 2) defines the significance of a heritage asset as: *“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*

Historic England’s Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019) sets out that significance should be assessed in relation to the same heritage interests; namely: archaeological, architectural, artistic or historic. It sets out the following definitions:

- *“Archaeological interest There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- *Architectural and artistic interest These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*
- *Historic Interest An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.”*

The above approach is consistent with PPG - paragraph: 006 reference ID: 18a-006-20190723. English Heritage: Conservation Principles, Policies and Guidance – For

Sustainable Management of the Historic Environment (2008) remains a live document for the present time but is expected to be removed in the coming years.

## 2.0 Identification of Heritage Assets to Assess

### 2.3 Identified Heritage Assets

The heritage assets that could potentially be affected by the subject proposals are outlined below. The numbering used below correlates with the Heritage Plot Plan shown at Figure 2.1 opposite to aid the reader with locating the heritage assets:

#### Designated Heritage Assets

##### Listed Buildings

1. 25 Whitehall (Grade II listed).

The relevant Historic England list entries are attached at **Appendix 2**.

##### Conservation Area(s)

None.

#### Non-Designated Heritage Assets

### 2.4 Scoped Out Heritage Assets

As the proposals are purely internal surrounding heritage assets have been scoped out.

Outside the Site's boundary and within the identified surrounding area of the Site are numerous heritage assets of varying significance and designations. Having borne in mind Historic England's Historic Environment Good Practice Advice in Planning Note 3—The Setting of Heritage Assets (2017), the heritage assets listed below are considered sufficiently well concealed from potential visual, traffic, emissions and noise impacts by existing topography, street pattern, built form and or dense foliage that they are unlikely to experience any effects to their heritage significance (whether visual, experiential or other) as a result of the proposed scheme. The following heritage assets have therefore been scoped out from our Heritage Statement:

- Whitehall Theatre (Grade II listed);
- Royal Bank of Scotland, 49-50 Trafalgar Square (Grade II listed);
- Harrington House (Grade II\* listed);
- 3 Whitehall (Grade II listed);



**Figure 2.1:** Heritage plot plan with the approximate Site boundary marked in red. The numbers used reference those at Paragraph 2.3.

- 37 & 39 Whitehall (Grade II listed);
- Whitehall House, 41 & 43 Whitehall (Grade II listed);
- Whitehall Conservation Area;
- Trafalgar Square Conservation Area;
- 27 Whitehall (Potential Non Designated Heritage Asset); and
- 29 Whitehall (Potential Non Designated Heritage Asset).



## 3.0 Outline History of Whitehall and Trafalgar Square

### 3.1 Saxon Period

Trafalgar Square and Whitehall are located within the Saxon Settlement of Lundenwic. Saxon London comprised two elements; Lundenwic, a busy market and international port and Thorney Island, a Saxon royal and religious centre. Lundenwic, founded in the 7th century, stretched from the walls of the Roman city (now City of London) to a southern edge between Trafalgar Square and Downing Street. The area around Charing Cross was at the centre of Lundenwic. The Strand formed part of the River Thames' frontage.

### 3.2 Medieval Period

The northern part of today's Trafalgar Square was common land known as St. Martin's Fields, which stretched from the junction of Charing Cross to St Giles-in-the-Fields and Hedge Lane (now Whitcombe Street). Towards the southern end of this area stood the old St Martin's Church, which was built during the reign of Henry II.

In 1291 the commemorative cross to Queen Eleanor was erected by Edward I on the location of today's Charing Cross. This cross was the last of the twelve crosses marking resting places of Queen Eleanor's funeral cortege on its way to Westminster Abbey.

In 1377, during the reign of Richard II the Royal Mews were built. They occupied the greater part of today's Trafalgar Square. The mews were built to house the Royal falconers and hawks.

In medieval London most of Whitehall belonged to the Abbot of Westminster. It subsequently passed to the Earl of Kent, who built a palace here. He bequeathed it to the Black Friars, who came to London in 1221. After his death in 1243, the friars sold the land in 1248, to Walter de Gray, the Archbishop of York (Chancellor of England 1205-14). He was Archbishop from 1215 until his death in 1255. He left York House to his successors in the See.

### 3.3 Tudor Period

Cardinal Wolsey came into possession of York Place (York House) through the See of York. In 1529 Henry VIII confiscated the property, and established the royal palace here called 'Whitehall', almost doubling its size. It extended almost from Charing Cross (and Scotland Yard) to Canon Row, Westminster.

After the dissolution of the monasteries in 1530-36, Henry VIII acquired all the lands belonging to the parish of St Martin's and the parish of St Margaret's to the south, which enabled him to lay out St. James Park and build St. James Palace on the plot of the leper house of St. James's. The Mews were also undergoing alterations at this time to accommodate the King's stables, following the fire in 1534



Figure 3.1: Aga's map of 1561: Source: St. Martins in the Field).



Figure 3.2: A depiction of Whitehall Palace, n.d. (Source: Historic England Places Archive).

### 3.0 Outline History of Whitehall and Trafalgar Square

at the original stables in Bloomsbury.

A thoroughfare between Charing Cross and Westminster existed in medieval times and by the 16th century it was a residential street. Inns, shops and houses were knocked down to make way for Henry VIII's new buildings. The Holbein Gate (north) was the northern gate on Whitehall and New Gate or King Street Gate (south) was located where Downing Street now runs into Whitehall.

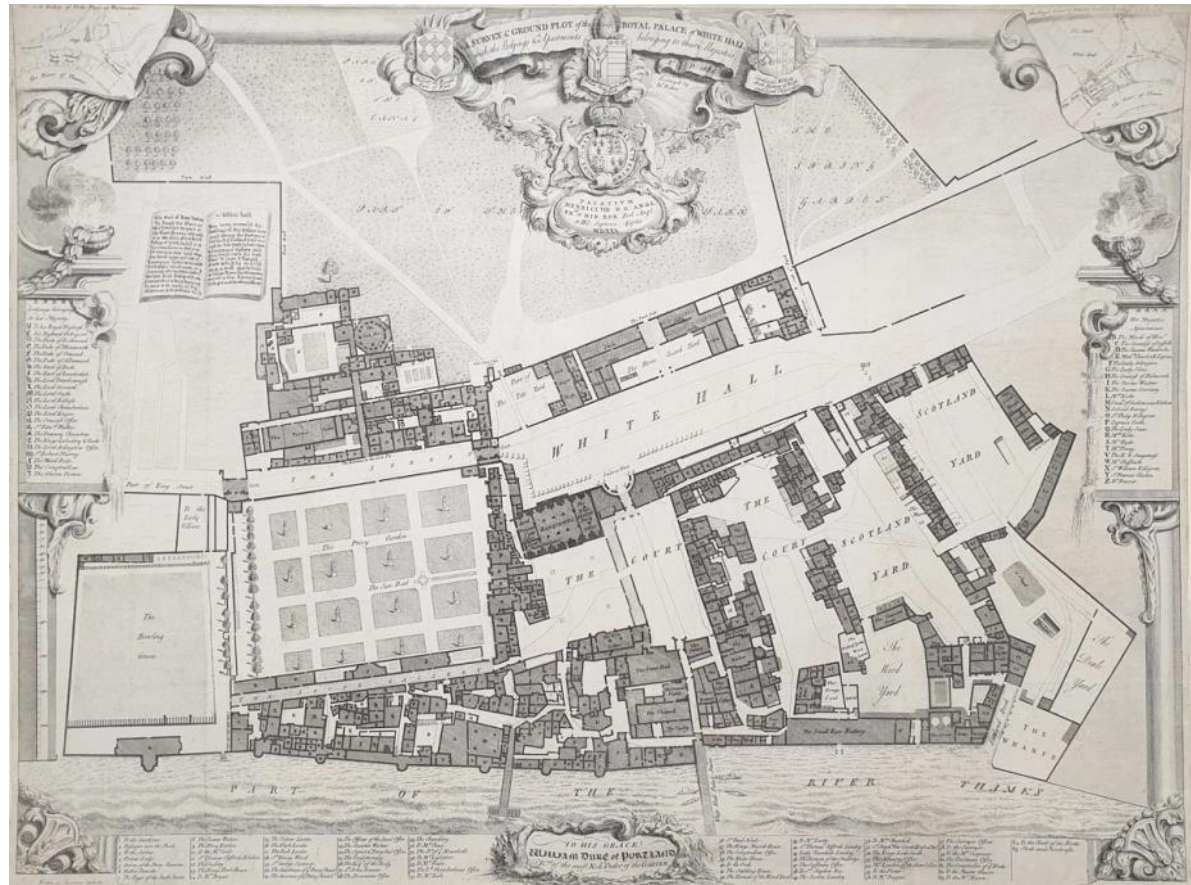
Four tennis courts were laid out, both covered and open, as well as a bowling green, a cockpit and a tilt yard used for bear-baiting. Along the east side of Whitehall was a large Privy Garden laid out in 1545. Whitehall became the chief residence of the court and it was here that Henry VIII died in 1547. The location of the tilt yard of Whitehall Palace lies on today's Horse Guards Parade.

In 1572 the first Banqueting House was built at Whitehall. Its replacement was a theatre, which burnt down in 1619.

### 3.4 17th and 18th Centuries

The New Banqueting House by Inigo Jones was faced with Portland stone commissioned by Charles I and opened in 1622. Its ceiling was painted by Rubens. In 1649 it provided the location for the beheading of Charles I. The fire of 1698, destroyed much of the Palace of Whitehall, but the Banqueting Hall survived.

Charing Cross, during the 17th century was used as a location for public executions which attracted large numbers of sympathetic onlookers, in order to protect the Palaces, the Government decided to move the execution site to Tyburn. In 1647 Eleanor's Cross was removed by the order of the Long Parliament. During the latter half of the 17th century, the Mews buildings were used as habitable spaces as the courts were unable to accommodate all the courtiers.



**Figure 3.3:** 18th century plan of the Palace of Whitehall by George Vertue after John Fisher's survey of 1680 (Source: Antique Maps).

Many taverns and coffee houses which were infamous for harbouring anti-Government organisations developed around Charing Cross. For example the Blue Post in Spring Garden was the meeting place for the Jacobite rebels during the reign of William III.

Between 1722-1726 St Martin-in-the-Fields church was built on St. Martin's Lane by James Gibbs. In 1732, George II commissioned the architect William Kent to rebuild the "Crown Stables".



## 3.0 Outline History of Whitehall and Trafalgar Square

The street plan of Downing Street, and the core of Nos. 10 and 11 Downing Street are formed from the structure of the houses built by Sir George Downing in 1682-83. George II repaired No.10 Downing Street and then offered it as a gift to his principal minister Sir Robert Walpole, who took up residence in 1735.

By the early 18th century, traffic pressures resulted in the decision to clear and broaden the centre of Whitehall. Thus in 1723 King Street Gate and the Gun platform were demolished, to be followed by the Holbein Gate and the adjoining house of Van Huls in 1759.

Thereafter, the growth of government services engendered new buildings in and near Whitehall. Importantly among those of the 18th century are the Admiralty (Ripley 1722-26) with its screen by Robert Adam (1759-61), the Horse Guards (Kent 1750-60), Kent's Treasury (1733-36) overlooking Horse Guards Parade and adjoining Dover House (c. 1700-10, a part of the Treasury Building).

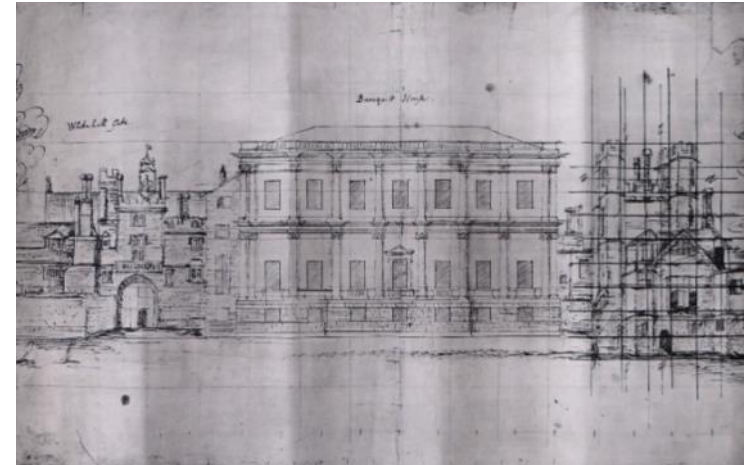
### 3.5 19th Century History

Trafalgar Square was built on the line of communications between the Mall, Pall Mall East, St. Martin's Place, the Strand, and Whitehall. In 1824 the purchase of John Julius Angerstein's collection of pictures was authorised by Parliament, thus forming the nucleus of the National Gallery Collection. These pictures were initially exhibited in the Angerstein Gallery at 100 Pall Mall. Designs for the new National Gallery, which was to occupy the north side of the square, as proposed by Nash, were prepared by Nash, C R Cockerell and William Wilkins. The William Wilkins' design was accepted. However, William Wilkins died before any decision was reached on his plan for the formal lay-out of the Square, and the matter was referred to Charles Barry. The lay-out of the square was not completed until circa 1850. The Royal Academy occupied the eastern half of the Gallery building until 1869 when it was moved to Burlington House in Piccadilly.

A national monument in honour of Nelson and in commemoration of the Battle of Trafalgar was commenced in 1839. The statue, which is of Craigeleith stone, was sculpted by Edward Hodges Baily and was erected in November 1843.

Part of the old precincts of the Old Whitehall Palace were originally made over for lodgings for the Kings of Scotland. By 1829, when Sir Robert Peel was searching for a suitable headquarters for his newly formed Metropolitan Police Force, only Great Scotland Yard remained of the King of Scotland lodgings. Gradually a new Police headquarters was established in the area, but by the 1870s the force had outgrown their accommodation.

Between 1868-74 the engineer Joseph Bazalgette oversaw the construction of the Victoria Embankment. Bazalgette adopted a scheme proposed some years earlier by artist John Martin – of a series of sewers intercepting the sewage destined for the Thames, and taking it to an outfall to



**Figure 3.4:** The Banqueting House with the Whitehall and Holbein Gates c. 1623 (Source: London Topographical Society).



**Figure 3.5:** Print of an engraving by Thomas Hosmer Shepherd, printed by Jones & Co., 1829] (Source: Ashrare).



## 3.0 Outline History of Whitehall and Trafalgar Square

the east of London. Bazalgette built two great intercepting sewers flanking the Thames, one on each bank, and covered them over with a promenade and gardens to form Victoria Embankment on the north bank, and Albert Embankment on the south. The District Line (then the Metropolitan District Railway) was also under construction at this time, and was therefore built alongside the new sewer on the north bank.

The architect chosen to design the new police headquarters and police station was Richard Norman Shaw. The new headquarters was then named New Scotland Yard. The police moved in in 1890, and in 1895 they expanded into the newly built Scotland House next door. They remained there up to 1967 when they moved to the Broadway.

The Foreign Office was completed in 1873 to the 1861 designs of Sir George Gilbert Scott. The New Government Offices (built as the New Public Offices) were built 1898-1912 by John Brydon and completed by Sir Henry Tanner. No. 55 Government Offices were built for the Ministry of Agriculture Fisheries and Food by J W Murray in 1909 and the Old War Office in 1898 by William Young. The area north of Richmond Terrace, called Whitehall Gardens, was laid out in 1824. This had formed part of the Privy Gardens and was the location for the Ministry of Defence building, designed 1913-15 by Vincent Harris, and built in phases between 1938 - 1940 and 1946 - 1959.

### 3.6 20th Century History

The triumphal Admiralty Arch was constructed from 1906-11 to a design by Sir Aston Webb. Incorporating office accommodation to each side and the official residence of the First Sea Lord, the arch forms a formal entrance to the royal processional route down the Mall and also forms a part of the national monument to Queen Victoria.

In the 1980s, the Government commissioned Richmond House for the DHSS, by William Whitfield and Partners, and the new Portcullis House (latter opened 2001), by Michael Hopkins and Partners, on the corner of Bridge Street and the Victoria Embankment.



**Figure 3.6:** Colour lithograph of Trafalgar Square from 1852 (Source: Art Collection).

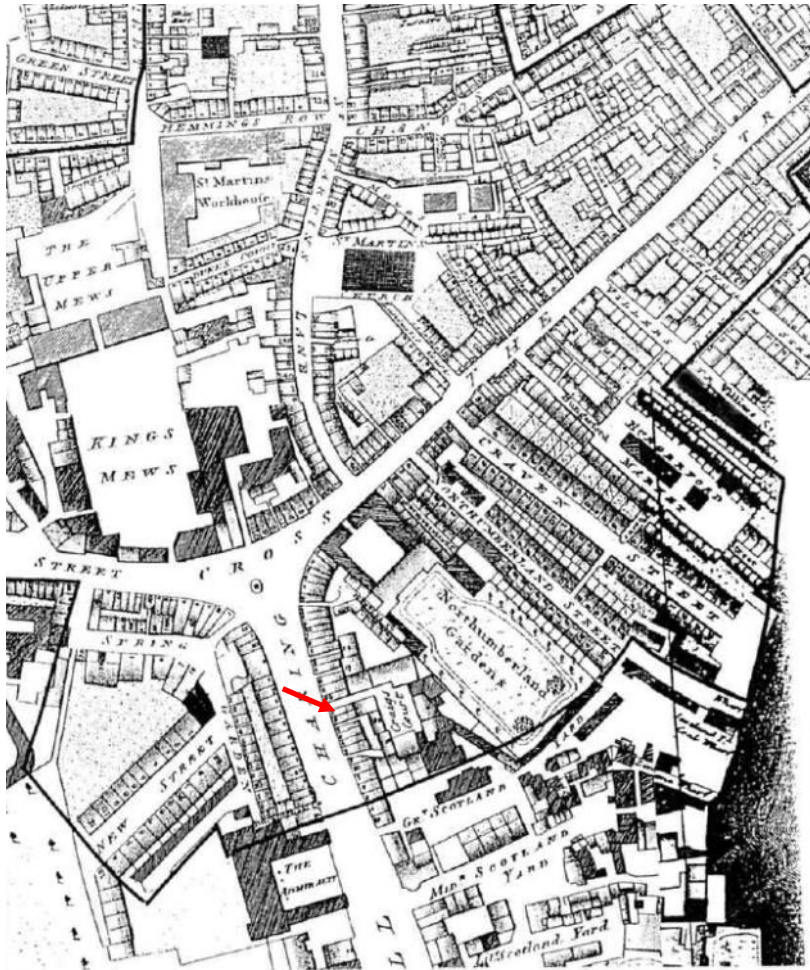


**Figure 3.7:** Admiralty Arch in 1923 (Source: Financial Times).

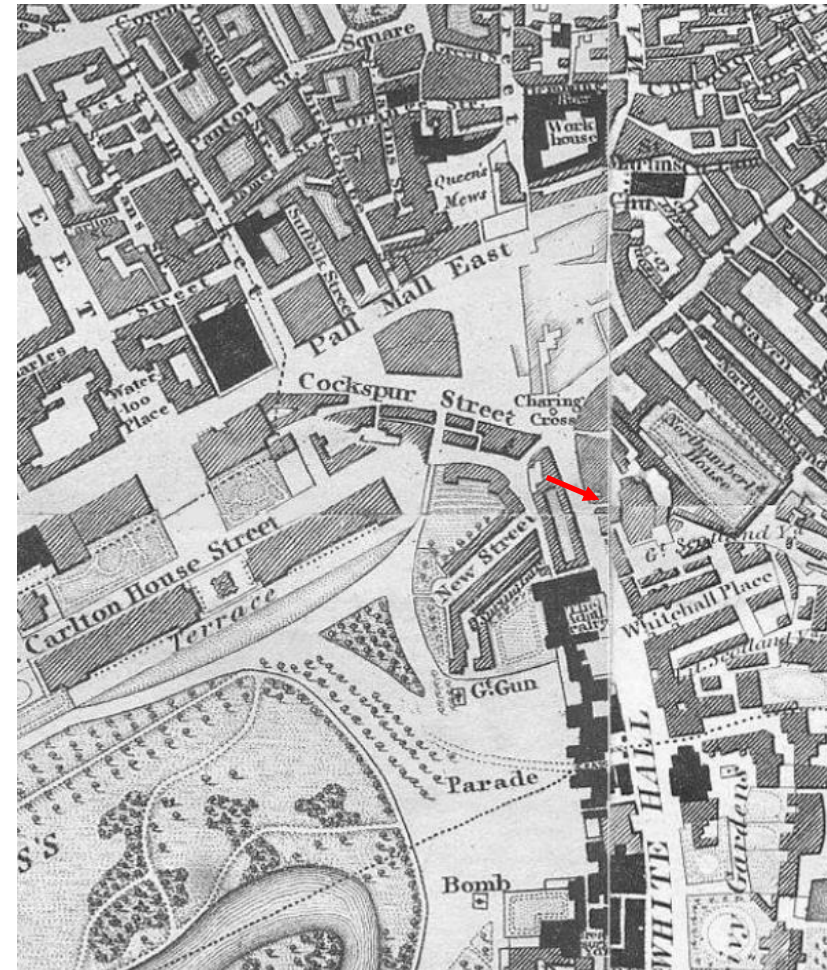




## 4.0 Site Map Regression



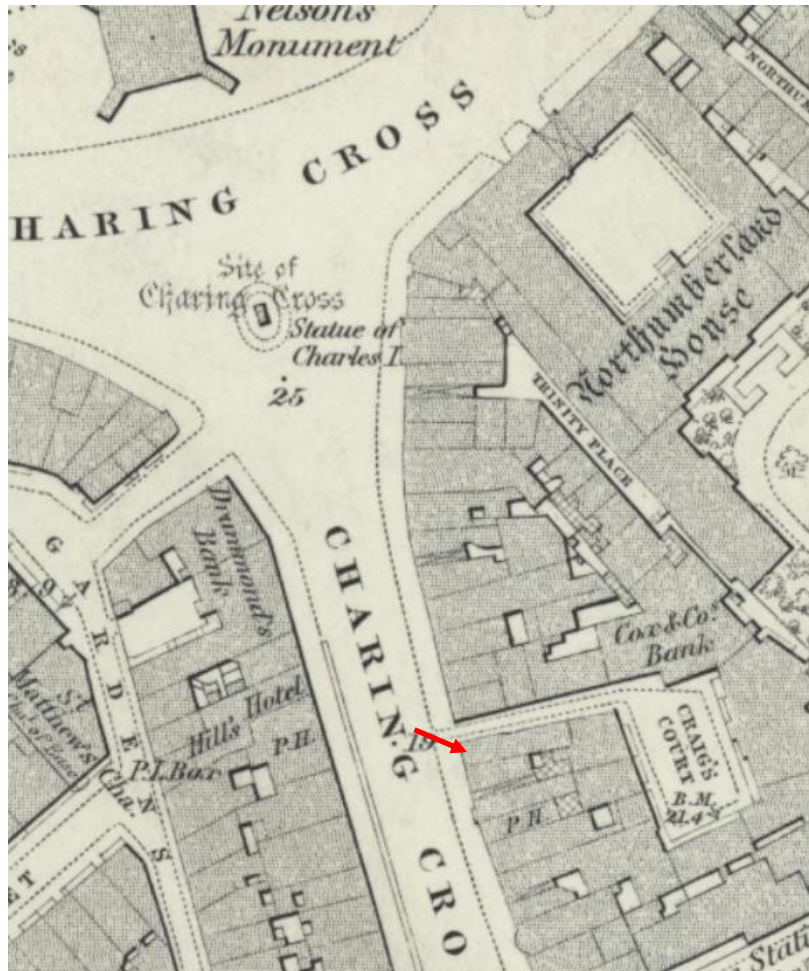
**Figure 4.3:** Horwood's Map of c 1792-99 with the approximate location of the Site marked in red. The boundary of the Trafalgar Square Conservation Area is marked in black (Source: Trafalgar Square Conservation Area Appraisal). Craig's Court and No. 25 Whitehall are shown for the first time.



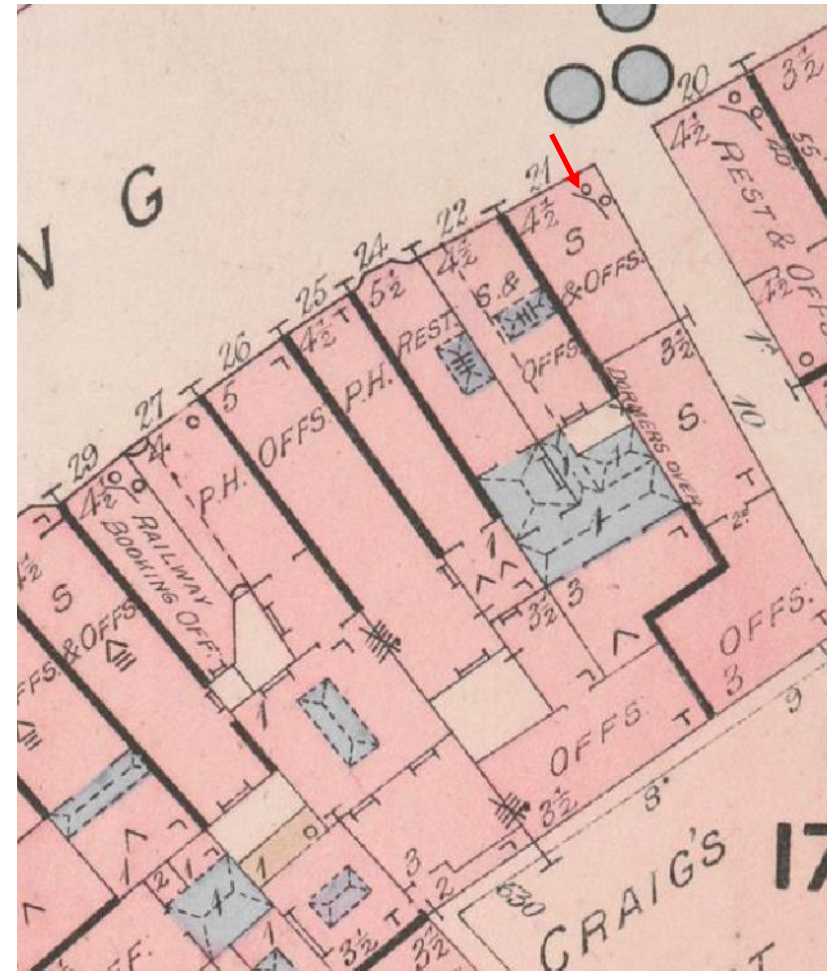
**Figure 4.4:** Greenwood's Map c. 1827 with the approximate location of the Site marked in red. This map is at a low level of detail.



## 4.0 Site Map Regression



**Figure 4.5:** 1869 OS map with the approximate location of the Site marked in red (Source: National Library of Scotland). We can see Craig's Court and Nos. 25 and 27 Whitehall in detail for the first time. We can also see a public house lies to the south of the Site, as it does today.

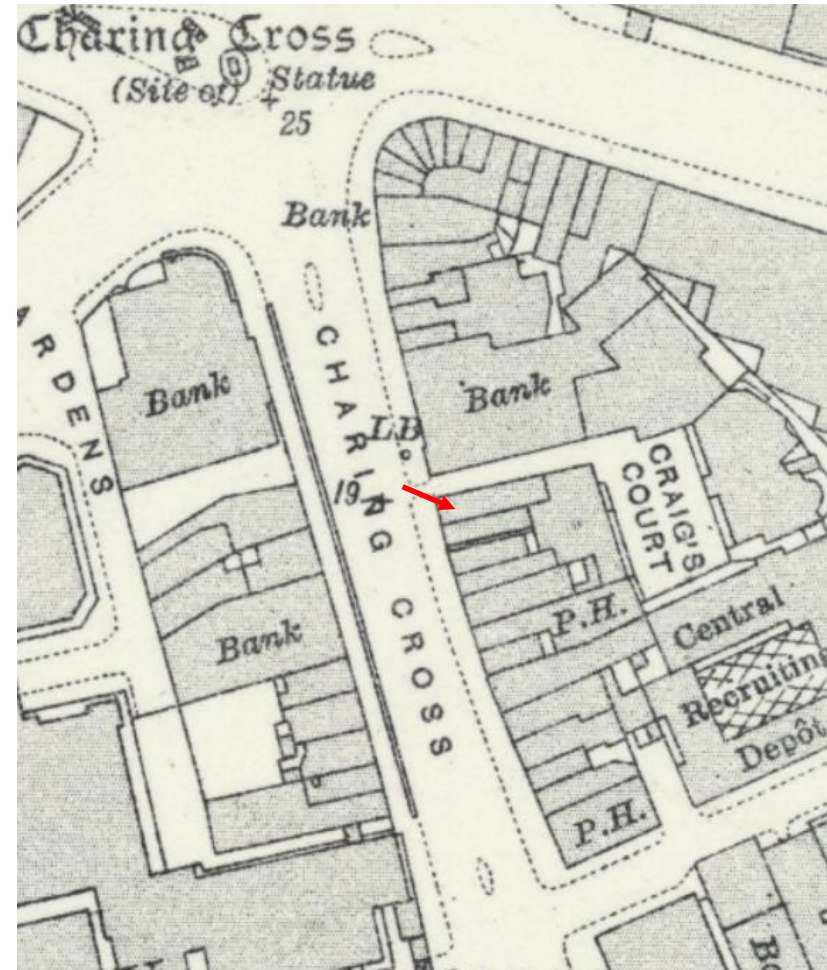


**Figure 4.6:** Goad fire insurance map of 1888 (Source: Commons Wikimedia). This map shows that today's 25 Whitehall was known as 21 Charing Cross at that time.

## 4.0 Site Map Regression



**Figure 4.7:** 1893 OS map with the approximate location of the Site marked in red (Source: National Library of Scotland). There is no relevant change on-site since Figure 4.6.



**Figure 4.8:** 1914 OS map with the approximate location of the Site marked in red (Source: National Library of Scotland). There is no relevant change on-site since Figure 4.6.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Archival Research

### **Craig's Court**

Built in the closing years of the 17th century, for the most part on an open space formerly belonging to the Hermitage of St. Katherine, Charing.

Craig's Court was built by Joseph Craig, who was a vestryman of the St Martin-in-the-Fields parish. Although the court first appears as a separate entity in the ratebook for 1696, some of the houses there had already been erected when in February 1693–4, Craig applied for a Crown lease of the ground on the south side. Craig is believed to have died in 1711.

Harrington House cannot be identified with absolute certainty until 1716, although some historians believe that it may have originally been Craig's own house.

According to rumour the single-track road - that is now the main entrance into Craig's Court— helped create the Westminster Pavement Act. In the early 1760s, the then Speaker of the House of Commons carriage got stuck in the court and he had to be pulled to rescue from the top of his carriage.

In August 1835, Henry Thomas de la Beche, Vice-President of the Geological Society obtained funding from the Board of Works to establish a museum at Craig's Court, Whitehall, London. The Museum of Economic Geology was opened in 1841.

Rumours circulate that there is an entrance doorway in Craig's Court to the secret tunnels under Whitehall that connect numerous government departments, famously used during WWII.



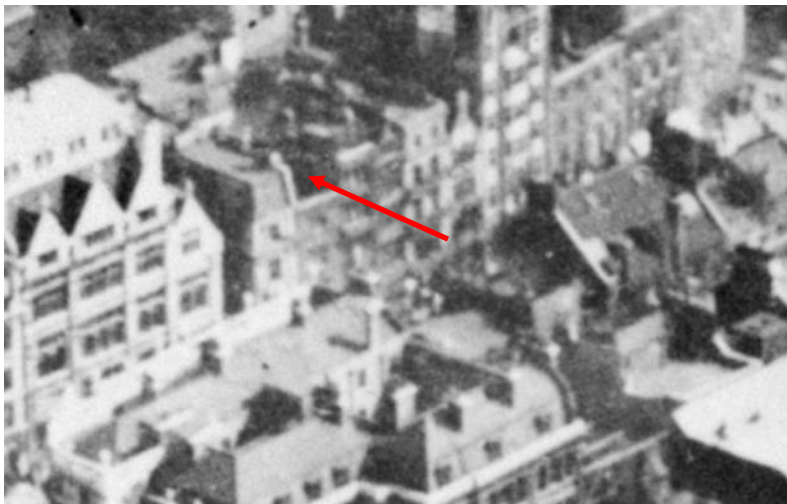
## 5.0 Background Understanding of On-Site Heritage Asset(s) - Archival Research



**Figure 5.1:** Showing No. 25 Whitehall formed part of a terrace of at least 4-bays in 1884 (Source: Historic England Archives).



**Figure 5.2:** 1910 photograph looking towards Nelson's Column. No. 25 Whitehall marked in red (Source: Historic England Archives).



**Figure 5.3:** 1921 historic photograph showing Nos. 25 and 27 before their roof extensions (Source: Britain from Above). No. 27 is marked in red.



**Figure 5.4:** Showing a roof extension had been added to No. 27 by 1951 (Source: Britain from Above).

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Archival Research



**Figure 5.5:** 2001 historic photograph of the Site (Source: Historic England Archives).

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Planning History

We have reviewed Westminster City Council's available online planning register and provide below the relevant application history for the Site and bearing in the mind the proposed scheme proposals. We have emboldened the most relevant applications.

- **97/0B316/FULL | NEW 5TH FLOOR MANSARD TO 25-31 WHITEHALL IN CONNECTION WITH CONVERSION OF 25-33 WHITEHALL TO 20 RESID. FLATS WITH A3 RESID.USE ON GRD FLR & BMT: RETENTION OF SILVER CROSS AS PUB | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 27th July 1998.**
- **97/0B317/LBC | PARTIAL DEMOLITION TO CREATE OPENINGS IN PARTY WALLS/ PARTIAL REBUILDING OF FACADE | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 27th July 1998.**
- 98/04137/FULL | INTERNAL AND EXTERNAL ALTERATIONS AND THE INSTALLATION OF NEW PLANT IN CONNECTION WITH USE OF BASMENT/GROUND FLOORS AT 25-31 WHITEHALL AS EXTENSION TO PUBLIC HOUSE AT NO. 33 | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 22nd December 1998.
- 98/04138/LBC | VARIOUS INTERNAL ALTERATIONS IN CONNECTION WITH EXTENSION OF EXISTING CLASS A3 | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 22nd December 1998.
- 98/04501/FULL | INTERNAL ALTERATIONS, ALTERATIONS TO ELEVATIONS INCLUDING INSTALLATION OF NEW SHOPFRONT & SIGNAGE (25-33 WHITEHALL) | 33 Whitehall London SW1A 2BX. Approved on 20th November 1998.
- 98/04491/LBC | INTERNAL ALTERATIONS, ALTERATIONS TO ELEVATIONS INCLUDING INSTALLATION OF NEW SHOPFRONT & SIGNAGE (25-33 WHITEHALL) | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 20th November 1998.
- 98/0A296/ADFULL | APPROVAL OF DETAILS PURSUANT TO PLANNING PERMISSION DATED 27/07/1998 RN97B316.CONDITION NOS 2 (i) & (ii), 3, 8 & 9 | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 17th February 1999.
- 99/00034/ADLBC | APPROVAL OF DETAILS PURSUANT TO LISTED BUILDING CONSENT DATED 27/07/1998 RN97B317A.CONDITION 2(i) & (ii) RELATING TO EXTERNAL JOINERY & NEW MANSARD ROOF | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 17th February 1999.
- **99/01652/FULL | ALTERATIONS DURING THE COURSE OF CONSTRUCTION INVOLVING MINOR INTERNAL AND EXTERNAL MODIFICATIONS FROM PLANNING PERMISSION DATED 22/12/98 (RN 984137) | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 28th April 1999.**
- 99/01653/LBC | ALTERATIONS DURING THE COURSE OF CONSTRUCTION INVOLVING MINOR INTERNAL AND EXTERNAL ALTERATIONS FROM LISTED BUILDING CONSENT DATED 22/12/98 (RN 984138) | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 20th May 1999.
- 99/04521/LBC | ALTERATIONS DURING THE COURSE OF CONSTRUCTION FOR 20 APARTMENTS ON FIRST TO FIFTH FLOORS WITH A3 UNIT ON GROUND AND BASEMENT LEVELS | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 9th September 1999.
- 99/04520/FULL | ALTERATIONS DURING THE COURSE OF CONSTRUCTION FOR 20 APARTMENTS ON 1ST TO 5TH FLRS WITH A3 UNIT ON GROUND & B'MT LEVELS (RESUBMISSION) TO SCHEME APPROVED 24/07/98 (RN97B316) | Craigs Court House 25 Whitehall London SW1A 2BX. Approved on 4th August 1999.



## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Front Elevation

The 1888 Goad fire insurance map at Figure 4.6 shows that today's 25 Whitehall was historically known as 21 Charing Cross.

The list entry comments that No. 25 Whitehall was originally built in the mid-late 18th century. The list entry also comments that the houses' front elevations were altered in the mid-19th century (see Figure 5.1 from 1884). This image shows that No. 25 formed part of a 4-bay terrace, taking in today's Nos. 25, 27, 29 and 31 Whitehall. The list entry also discusses that No. 25's front elevation was refaced in stone (Bath stone mostly instead of the stated Portland stone) in c. 1900. That said, from reviewing Figures 5.2 and 5.3 it is clear these works were undertaken between 1910 and 1921.

### Front Elevation

The elevation is a single bay in width and arranged over ground to fourth floors.

### Ground Floor

The ground floor of the building comprises a modern but traditional public house frontage. We know from the Goad insurance plan that the ground floor at that time was in use as 'S' - or shop. A public house is shown at today's Nos. 33 and 37 Whitehall at that time, which matches the locations of Silver Cross and The Old Shade public houses today. Over time Silver Cross public house has seemingly expanded northwards and today occupies Nos. 25 and 27 Whitehall also.

The Whitehall frontage comprises a late 20th century frontage using good quality, high density timber and comprises low level timber panelling with affixed moulding seeking to resemble fielded panelling. Above this panelling the elevation is largely glazed with small panes and copious timber glazing bars in a traditional manner. In the centre of the elevation are a pair of largely glazed (double glazed) oak doors with brass door furniture dating from the late 20th century approximately. The entrance is flanked by reproduction brass and steel carriage lights. Above the fascia of the premises proclaims 'Silver Cross'. The apex of the fascia has a Bath stone cornice, which forms part of the early 20th century refronting of the building.

### First Floor

At first floor the elevation is clad in Bath stone ashlar. At either extreme of the narrow elevation are Giant Roman Ionic pilasters (no entasis) that rise from first to second floors. The first floor window is prominent comprising a canted oriel window enriched with concave Doric stone pilasters, and architraves, a cornice merged with a second floor balcony and matching concave Doric pilasters to the sides. The overall effect is to give the first floor windows the most prominence on the front elevation. This would befit the *piano nobile*, although the floor



Figure 5.6: Showing the front elevation of No. 25 is marked in red.



Figure 5.7: Showing the ground floor public house frontage.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Front Elevation

to ceiling heights do not appear taller at first floor level compared to those above. The window itself appears to be an early 20th century '1 over 1' timber sash window with sash horns. The northern end of the elevation on the corner of Craig's Court appears to have undergone recent sympathetic mortar repairs to the ashlar.

### Second Floor

This part of the elevation is again clad with Bath stone ashlar and forms the original attic floor of the building (i.e. above the cornice). The second floor window has a matching sash surrounded by a Bath stone eared architrave. A blank frieze lies above, followed by a modillioned cornice and an open segmental pediment. In the opening in the open segmental pediment is a second floor window. This window is a timber '1 over 1' sash window with sash horns. Above the window has a triangular pediment and stunted Doric pilasters at the extremes of the elevations.

### Third Floor

This floor level is evident on Figure 5.3 from 1921, although it is interesting to note it is a later addition as confirmed by the list entry. From its design it appears to date from the turn of the 20th century until reconfigured in the late 20th century. The roof at that time was a monopitched roof fronting Whitehall covered with traditional grey slates, and then a flat roof running the length of the building. As seen today the front roofslope remains inclined and again is covered with traditional grey slates. In the centre of the elevation is a flat roofed dormer with lead covering to its roof and cheeks. The window is a '2 over 2' sash window. A dormer window in this location is potentially visible in Figure 5.3 (1921) and is visible in Figure 5.4 from 1951.

**N.B. the subject flat is situated on the third floor of part of No. 25 Whitehall and No. 27 Whitehall.**

### Fourth Floor

Following approved Application References 97/OB316/FULL and 97/OB317/LBC a roof extension was built at fourth floor level. This extension continued the pitch of the third floor roofslope, and is also covered with traditional grey slates. Also present is a matching dormer to that described at third floor level. The roof above is a flat roof (not inspected).



**Figure 5.8:** Showing the first to fourth floors of Nos. 25 and 27.



**Figure 5.9:** Showing the third floor (marked in red) of the front elevation.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—N/Elevation & Roof

### Northern Elevation

This elevation extends to 11 bays. At ground floor the public house frontage returns from the front elevation.

At first floor to third floor levels the most westerly two bays are clad with Bath stone ashlar matching that used on the front elevation.

The first floor windows comprise paired '1 over 1' timber sash windows. They are flanked by moulded stone architraves and the latter are flanked by narrow stone Ionic pilasters. The architraves are topped with a stone cornice. Above are truncated Ionic pilasters rising to second floor cill level.

At second floor level the windows comprise paired '1 over 1' timber sash windows. They are flanked by moulded eared stone architraves. At first and second floor levels the two westernmost bays on the elevation have Bath stone Ionic Giant Order pilasters matching those seen on the front elevation.

At third floor level a prominent modillioned stone cornice returns from the front elevation along the northern elevation for the two westernmost bays. Above the cornice are a pair of '1 over 1' timber sash windows surrounded by moulded stone architraves.

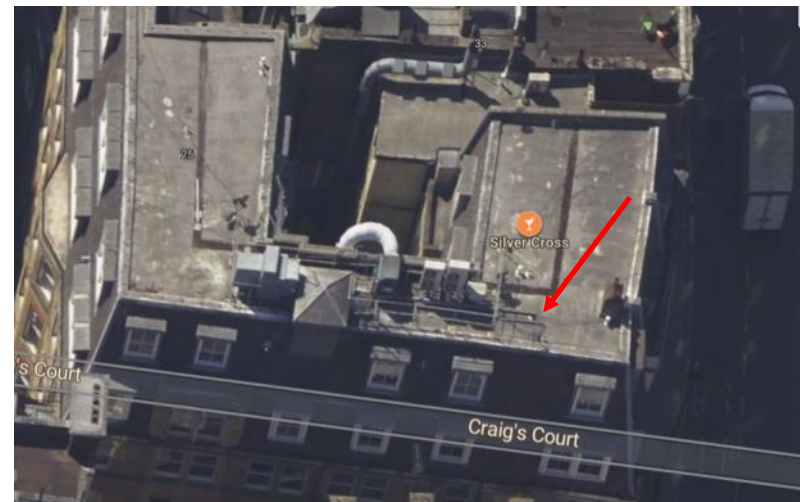
At fourth floor level are a pair of flat roofed dormers with '2 over 2' timber sash windows. Above this a single flat roofed dormer with '2 over 2' timber sash window. Its roof and cheeks are covered with lead.

The remainder of the elevation was built in buff London stock brick and seems to date to the alterations in the early 20th century. The windows are paired and have flat arches formed of red rubbed bricks. The windows are timber '1 over 1' sash windows. Single flat roofed dormers are located at third and fourth floor levels.

The main entrance into the upper parts of No. 25 is provided on this elevation. The entrance comprises a panelled door with glazed panes in the upper portion, flanked by a matching margin light and panelling to the eastern side. To its western side is a Bath stone ashlar architraved window opening. Above the entrance door and aforementioned window is an oversized Diocletian window with bold Bath stone corniced architrave. Above the Diocletian window are a pair of Bullseye windows with red brick rowlock bond brickwork.



**Figure 5.10:** Showing the view from Whitehall into Craig's Court.



**Figure 5.11:** Bing maps aerial photograph showing the third and fourth floor levels and the roof of No. 25 Whitehall (latter marked in red).



## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

The interior of the flat appears to have been refurbished approximately 25 years ago, which ties in with approved Application References 97/OB316/FULL and 97/OB317/LBC.

The flat forms a lateral conversion of part of two buildings; namely 25 Whitehall (Grade II listed) and 27 Whitehall.

### Hallway

The front door comprises a modern panelled door dating from the late 1990s works and is of no heritage value. It appears to be formed of plywood and is of mediocre quality. The entrance door's architrave is generic, but traditional. It is formed of moulded timber and dates from the 1990s works. It is not considered of such quality so as to contribute towards significance.

The entrance hall contains a modern floor covering, whose composition is not entirely clear without lifting a portion of it. It certainly has a laminate coating on its upper surface. Parts of the floor are also springy underfoot, which often occurs due to a lack of strength in the floor covering. In any event the floor is not historic from reviewing its appearance and it is typical of laminate/composite floors fitted approximately 25 years ago when the flat was converted. The existing floor seeks to resemble traditional floorboards, but is modern and potentially not entirely solid timber. As parts of the floor are springy underfoot and some areas are beginning to delaminate, overall, the existing floor covering detracts from significance.



**Figure 5.12:** Showing the front door into the flat as seen internally.



**Figure 5.13:** Showing the boiler cupboard and door.



**Figure 5.14:** Showing the doorway from the hallway into the kitchen/sitting room.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

The cupboard on the southern side of the entrance hall contains the flat's boiler. This enclosure is formed of stud partitioning and plasterboard and is of no heritage value. The door is a modern, sympathetic 6-panelled timber door and has a modern generic moulded timber architrave surrounding the doorway. Both are not considered of such quality so as to contribute towards significance.

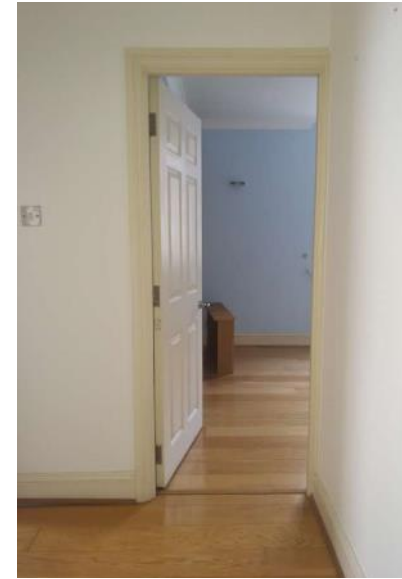
The doorway into the kitchen/sitting room contains a matching door and architrave dating from the 1990s works, of no heritage value.

The doorways from the hallway into the Master Bedroom, Central Bedroom, Eastern Bathroom and Eastern Bedroom contain a matching door and architrave to those described dating from the 1990s works, of no heritage value. This is the case on the room side of each doorway also.

All skirting boards within the hallway are moulded timber examples, and date to the 1990s works. Again these are sympathetic but not considered of such quality so as to contribute towards significance.



**Figure 5.15:** Showing the doorway into the Master Bedroom from the hallway.



**Figure 5.16:** Showing the doorway into the Central Bedroom from the hallway.



**Figure 5.17:** Showing the doorway into the Eastern Bathroom from the hallway.



**Figure 5.18:** Showing the doorway from the hallway into the Eastern Bedroom.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

### Kitchen/Sitting Room (Within No. 27)

The kitchen is located in the front room within No. 27 facing Whitehall. This room has modern kitchen units and appliances fitted on the eastern wall and parts of the northern and southern walls. This fitted kitchen dates from the late 1990s consent. These are of no heritage value.

The northern wall in the kitchen appears to have historically contained a chimneybreast, which is indicated by its date of construction but also the chimneystack at roof level seemingly serving the front room of No. 25 and No. 27. The northern wall of the room is boxed out on the eastern side of the chimneybreast to create a flush wall to align the kitchen units. This obscures the original position of the chimneybreast and detracts from significance.

The original fireplace has also been infilled and a skirting board placed across the former fireplace's location, blurring the legibility of the chimneybreast's original function. Both elements detract from significance.

Above the kitchen area is a suspended ceiling with downlighters. The suspended ceiling is fairly deep and significantly reduces the floor to ceiling height in this part of the room and detract from significance.

The floor in this part of the flat is tiled from the late 1990s. These are generic quality and also not of any heritage value. The remainder of the floor within this room is fitted with modern laminate/composite flooring simulating



**Figure 5.19:** Showing the kitchen area and the suspended ceiling above.



**Figure 5.21:** Showing the kitchen's tiled floor.



**Figure 5.20:** Showing the chimneybreast on the northern wall of the kitchen. The area of boxing out is shown in red.



**Figure 5.22:** Showing the coving in the kitchen area.



## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

traditional timber floorboards, of no heritage value.

The room has coving around its perimeter and on the edge of the suspended ceiling. This is a bland modern addition of no heritage value.

The window facing Whitehall has aluminium framed secondary glazing dating from the late 1990s. This is of no heritage value and appears tired and in need of replacement. The window has a moulded timber architrave internally dating from the early 20th century. This architrave is segmental at its apex mirroring the shape of the window and the architrave continues to floor level. The window itself appears to date from the early 20th century. The bottom rail of the lower sash is in disrepair and requires sanding, repainting and perhaps some minor areas of spliced timber repair.

All skirting boards in the room are moulded timber examples, and date to the 1990s works. Again these are sympathetic but not considered of such quality so as to contribute towards significance.

The remainder of the room is used as a sitting room. The floor is again covered with the aforementioned laminate/composite flooring of no heritage value.



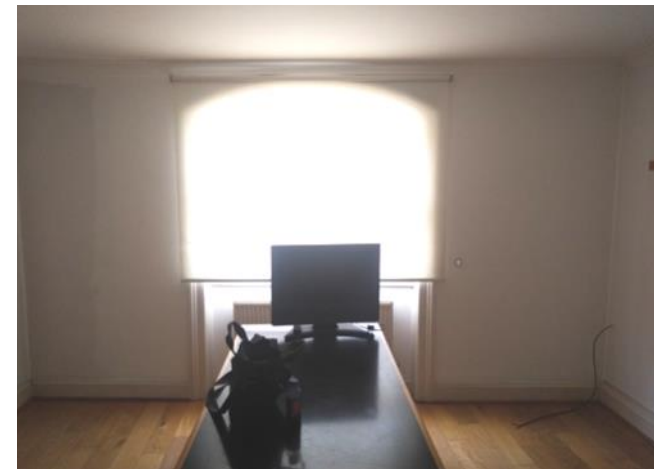
**Figure 5.23:** Showing the window architrave.



**Figure 5.24:** Showing the disrepair of bottom rail of the lower sash.



**Figure 5.25:** Showing the central glazing bar of the sitting room window.



**Figure 5.26:** Showing the sitting room.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

### Master Bedroom (Within No. 25)

This room contains modern laminate/composite flooring simulating traditional timber floorboards, of no heritage value.

The room contains wall mounted laminated chipboard/MDF shelving dating from the last 25 years. These are of no heritage value. The shelving is fitted to all walls, leaving gaps for the windows, door and chimneybreast. Modern moulded timber skirting boards are fitted between the shelving uprights (rather than behind the shelving affixed to the walls in the usual way) and are also of no heritage value.

On the eastern side of the room is an historic chimneybreast, which is no longer in use with the fireplace having been infilled. This infilling blurs its original use and detracts from significance. The chimneybreast corbels towards its apex and is one of the only elements of historic fabric within the interior of the flat.

The window facing Whitehall has aluminium framed secondary glazing that dates to the last 25 years and is of no heritage value. The window has a moulded timber architrave internally dating from the early 20th century with apron detail. The floor to ceiling heights within No. 25 compared to No. 27 within the flat are noticeably taller, and grander.

The ceiling of the room has a moulded cornice dating from the mid-19th century.

On the northern wall of the room there are two windows seemingly built as part of the early 20th century alterations. The windows have a



**Figure 5.27:** Showing the western wall in the Master Bedroom.



**Figure 5.28:** Showing the window architrave of the western wall in the Master Bedroom.



**Figure 5.29:** Showing the chimneybreast on the southern wall of the room.



**Figure 5.30:** Showing the northern wall of the room.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

combined moulded timber architrave internally dating from this period.

### Central Bedroom (Within No. 25)

This room contains modern laminate/composite flooring simulating traditional timber floorboards, of no heritage value.

The window facing Whitehall has aluminium framed secondary glazing that dates to the last 25 years and is of no heritage value. It is likely that the window in this room and the window in the existing Eastern Bedroom historically lay window the same room, and would likely have contained a combined window architrave matching that seen in the Master Bedroom. As seen today the window has a very plain modern timber cill that is truncated on its eastern side due to the presence of the modern wall dividing the Central Bedroom from the Eastern Bathroom. The current cill is of no heritage value

The ceiling has modern coving of no heritage value. Indeed coving does not sit comfortably with the character of the original building and is considered to detract from significance.

On the western wall of the room is a fitted wardrobe formed of glazed panels framed in a metal surround. This wardrobe dates the last 25 years and is noticeably contemporary and of mediocre quality. It is of no heritage value.

The room has modern, sympathetic moulded timber skirting boards of no heritage value.



Figure 5.31: The northern wall of the Central Bedroom.



Figure 5.32: Modern wardrobe on the western wall of the room.



Figure 5.33: Showing the coving in the room.



Figure 5.34: Showing the doorways within the room.



## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

### Central Bathroom (Within No. 25)

The room comprises a room subdivided from the Central Bedroom, which in turn was subdivided from what is today the Eastern Bedroom. The bathroom contains a modern bath, wash hand basin and W.C. of no heritage value.

The walls forming this room are non substantial and clearly of modern construction. They are likely formed of stud partitioning and plasterboard and likely date to the last 25 years undertaken when the building was converted to flats. These walls are of no heritage value.

The floor covering comprises modern floor tiles of a mediocre quality, of no heritage value.

### Eastern Bathroom (Within No. 25)

The ceiling in the room is suspended some distance below the original ceiling level, which blurs legibility of the full height of the room historically. The suspended ceiling is also set lower than the window head, and lower than the top of the window, which is incongruous. The window as seen today has no window architrave and has been tiled on the window reveals. All these elements detract from significance.

Otherwise the room is fitted with contemporary bathroom fittings dating from the last 25 years. These are good quality contemporary fittings of their time, but are not of such quality such that they would contribute towards significance.

The window facing Whitehall has aluminium framed secondary glazing with obscured glass



**Figure 5.35:** Showing the Central Bathroom.



**Figure 5.36:** Showing the Eastern Bathroom. Note the suspended ceiling and that the top of the window is not visible.



**Figure 5.37:** Showing the gap between the suspended ceiling and the window.



**Figure 5.38:** Showing the modern fittings in the Eastern Bathroom.

## 5.0 Background Understanding of On-Site Heritage Asset(s) - Site Inspection—Interior

that dates to the last 25 years and is of no heritage value.

### Northern Bedroom (Within No. 25)

This room also contains a pair of windows, matching the configuration seen in the Master Bedroom. The windows have lost their combined historic moulded timber window architraves, although this may be partially concealed under plaster. As seen today each window has a plain timber cill of no heritage value.

The windows facing Craig's Court has aluminium framed secondary glazing that dates to the last 25 years and is of no heritage value.

This room contains modern laminate/composite flooring simulating traditional timber floorboards, of no heritage value.

The room has modern, sympathetic moulded timber skirting boards of no heritage value.

The ceiling includes a modern cornice approximately copying the historic example in the Master Bedroom. This is assumed to form part of the 1990s works also. This element was undertaken sympathetically and contributes towards significance to a negligible degree.

There is no chimneybreast in this room and the eastern wall is not entirely flat, containing an awkward junction near the eastern window. It is likely that this room was historically combined with accommodation further east, which today lies within another flat within the building.



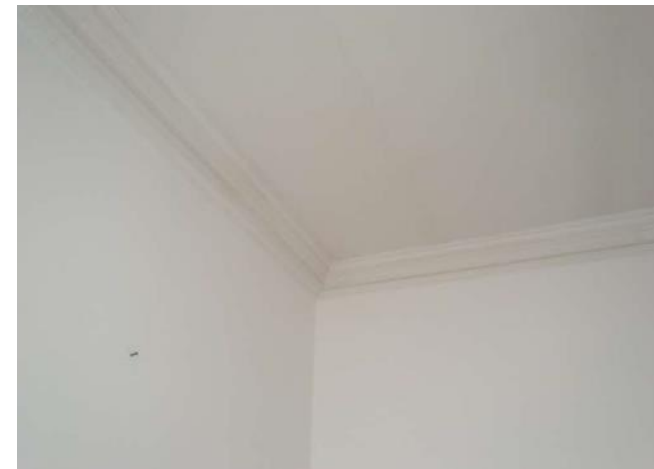
**Figure 5.39:** Showing the window in disrepair in the Eastern Bathroom.



**Figure 5.40:** Showing the windows in the Eastern Bedroom.



**Figure 5.41:** Showing the Eastern Bedroom.



**Figure 5.42:** Showing the ceiling cornice.

## 6.0 Assessment of Significance

### 6.1 Designated Heritage Assets

#### 25 Whitehall (Grade II listed)

##### Architectural Description

See Section 5.

##### Assessment of Significance

No. 25 forms part of a short mid-late 18th century terrace, since seemingly mostly redeveloped apart from No. 25. The latter itself has been significantly altered with a Bath stone replacement frontage with Palladian overtones in the early 20th century. Other key alterations include the early-mid 20th century 4th floor, the turn of the 21st century 5th floor and the numerous reconfiguration works internally at the turn of the 21st century. The ground floor public house frontage is traditional but modern, and not considered of such quality so as to contribute towards significance.

The Craig's Court frontage comprises good quality brickwork typical of its time, not likely to be considered of special interest itself. The most notable element on the Craig's Court elevation is the oversized Diocletian window and the pair of bullseye windows above.

Architecturally the most accomplished elements of the Whitehall (front) elevation are the Bath stone frontage facing Whitehall and its two bay return along Craig's Court. This Giant Order Ionic pilasters, open segmental pediment, and canted oriel window are notable elements of the front elevation.

Internally, with the subject flat in mind solely, there is little surviving historic fabric. There is an historic moulded timber window architrave in the kitchen (in fact within No. 27 Whitehall—not listed), a combined moulded timber architrave in the Master Bedroom on the northern elevation, an historic window architrave within the Master Bedroom on the western elevation and an historic chimneybreast in the Master Bedroom. The plan form has been largely compromised during the lateral conversion of the flat merging parts of Nos. 25 and 27.

Overall, No. 25 is considered of moderate architectural and artistic interest. It is noted that the list entry comments that the building was listed for group value only with the surrounding historic buildings along Whitehall.

Historically, some parts of the existing building date from the mid-late 18th century, although the proportion is likely to be low given the degree of rebuilding undertaken on the building over time. These earliest portions of historic fabric therefore form part of the rebuilding of Whitehall following the Whitehall Palace fire of 1698. The listed building does not have any association with the former Palace and does not date from before the fire. The on-site building is also not part of the earliest Craig's Court buildings that started to appear on Craig's Court in the 1690s. The building therefore does not have a former functional link or historic association with Joseph Craig, who was a vestryman of the St Martin-in-the-Fields parish.

The building does have a low level of historic interest in illustrating the historic development of the local area.

On the basis that this part of London has been continuously developed since Saxon times, it is possible the building has some above ground archaeological interest. Most of this will lie in any remnants of the mid-late 18th century building.

##### **Contribution of Setting to Significance**

The on-site building has no historical association or former functional link with the other historic buildings surrounding the Site on Whitehall or Craig's Court. It is surrounded by many notably historic buildings that form part of its historic, and in some cases, original setting. These have a strong group value. This is particularly the case with those buildings that line Whitehall, that forms a grand processional thoroughfare between Trafalgar Square and Parliament Square. These surrounding historic buildings contribute strongly to the significance of the listed building via setting.



## 7.0 Scheme Overview and Assessment of Potential Heritage Impacts

### 7.1 Scheme Overview

#### Throughout Flat

- Sanding of all laminate/wood flooring and revarnishing.

#### Kitchen

- Replacement of all secondary glazing in room;
- Replacement of existing kitchen floor tiles; and
- Replacement of current kitchen units and appliances.

#### Central Bathroom

- Infilling of existing doorway into room;
- Creation of new doorway into room including associated demolition; and
- Removal of existing bathroom fittings and installation of new sanitaryware and shower.

#### Master Bedroom

- Removal of wall mounted shelving units; and
- Replacement of all secondary glazing in room.

#### Eastern Bathroom

- Replacement of secondary glazing in room.

#### Central Bedroom

- Removal of built-in wardrobe; and
- Replacement of all secondary glazing in room.

#### Eastern Bedroom

- Replacement of all secondary glazing in room.

### 7.2 Assessment of Potential Heritage Impacts

#### 25 Whitehall (Grade II listed)

##### Throughout Flat

##### **Sanding and Revarnishing of Laminate/Wood Floor**

The entrance hall contains a modern floor covering, whose composition is not entirely clear without lifting a portion of it. It certainly has a laminate coating on its upper surface. Parts of the floor are also springy underfoot, which often occurs due to a lack of strength in the floor covering. In any event the floor is not historic from reviewing its appearance and it is typical of laminate/composite floors fitted approximately 25 years ago when the flat was converted. The existing floor seeks to resemble traditional floorboards, but is modern and potentially not entirely solid timber. As parts of the floor are springy underfoot and some areas are beginning to delaminate, overall, the existing floor covering detracts from significance.

The scheme proposes sanding the laminate/wood flooring throughout the flat to remove the areas where the varnish has peeled away and revarnishing the floor to improve its overall appearance. This is a like-for-like repair of a modern element of the flat. This part of the scheme would have a neutral impact on the significance of the listed building.

##### Kitchen

##### **Replacement of secondary glazing**

The existing secondary glazing dates to the last 25 years and is of no heritage value. Its removal would not therefore lead to the loss of historic fabric and is considered to have a neutral impact of No. 27 Whitehall.

New like-for-like aluminium secondary glazing would be installed. The proposed configuration would have two large glass panes as per the existing, and the meeting rails of the secondary glazing would be designed to align with the meeting rails of the sash windows so that they are not visually discordant when seen internally or externally.

## 7.0 Scheme Overview and Assessment of Potential Heritage Impacts

It should be noted that this part of the flat is located within 27 Whitehall and does not form part of the listed building therefore and arguably Listed Building Consent is not required for this part of the scheme. In any event this part of the scheme has been carefully specified to be sympathetic to historic fabric and the character of Nos. 25 and 27 and would have a neutral impact on the significance of the listed building (No. 25 Whitehall).

### **Replacement of Existing Kitchen Floor Tiles**

The floor in the kitchen section of the existing kitchen/sitting rooms is tiled. These tiles dates from the late 1990s, are of generic quality and are of no heritage value.

The scheme proposes their replacement with modern ceramic tiles. No historic fabric would be lost. This part of the scheme would have a neutral impact on the significance of the listed building.

### **Replacement of Existing Fitted Kitchen**

The existing kitchen comprises modern kitchen units and appliances fitted in the last 25 years. These are of no heritage value and their removal would have a neutral impact on the significance of the listed building.

It should be noted that this part of the flat is located within 27 Whitehall and does not form part of the listed building therefore and arguably Listed Building Consent is not required for this part of the scheme.

The scheme proposes the installation of replacement kitchen units and appliances. No historic fabric would be lost in its installation. This part of the scheme would have a neutral impact on the significance of the listed building (No. 25 Whitehall).

### **Central Bathroom**

#### **Infilling of existing doorway into room**

The existing bathroom was created seemingly from a larger room formed by the Central Bedroom, the Central Bathroom and Eastern Bathroom. The current wall that divides the Central Bedroom from the Central Bathroom is a modern stud and plasterboard partition wall of no heritage value.

The scheme proposes the infilling of this doorway. Accordingly the modern timber architraves will be removed either side of the existing doorway and the existing

doorway opening infilled with matching studs and plasterboard. This part of the scheme would have a neutral impact on the significance of the listed building.

#### **Creation of new doorway into room including associated demolition**

As discussed the existing bathroom was created seemingly from a larger room formed by the Central Bedroom, the Central Bathroom and Eastern Bathroom. The current wall that divides the Central Bathroom from the adjoining corridor to its west is a modern stud and plasterboard partition wall of no heritage value. Nor is the existing wall in this position considered to lie in the position of an historic wall and therefore is not important to the understanding of the historic plan form of the building.

The scheme proposes the creation of an opening in this location to create a replacement doorway. New matching timber architraves would be fitted to the new doorway match the existing either side of the existing bathroom doorway. Likewise a new 6-panelled pine door would be fitted to match the existing.

This part of the scheme would have a neutral impact on the significance of the listed building.

#### **Removal of existing bathroom fittings and installation of new sanitaryware and shower**

The existing fittings are modern and date to the last 25 years. In addition this part of the building historically was not used as a bathroom. The existing fittings are therefore of no heritage value and this part of the scheme would have a neutral impact on the significance of the listed building.

### **Master Bedroom**

#### **Removal of wall mounted shelving units**

The existing shelving units are modern fittings dating to the last 25 years. Their removal is unlikely to require Listed Building Consent, but the removal of this item is included for completeness.

No historic fabric would be lost in their removal and therefore this part of the scheme would have a neutral impact on the significance of the listed building.

## 7.0 Scheme Overview and Assessment of Potential Heritage Impacts

### Replacement of all secondary glazing in room

The existing secondary glazing dates to the last 25 years and is of no heritage value. Its removal would not therefore lead to the loss of historic fabric and is considered to have a neutral impact of the listed building.

New timber secondary glazing would be installed. The proposed configuration would have two panes as per the existing, and the meeting rails of the secondary glazing would be designed to align with the meeting rails of the sash windows so that they are not visually discordant when seen internally or externally.

This part of the scheme would have a neutral impact on the significance of the listed building.

### Northern Shower Room

#### Replacement of secondary glazing in room

See above comments on this topic.

### Central Bedroom

#### Removal of Built-in Wardrobe

These are modern and built in the last 25 years. Their removal would not therefore lead to the loss of any historic fabric. This part of the scheme would have a neutral impact on the significance of the listed building.

#### Replacement of secondary glazing in room

See above comments on this topic.

### Overall Assessment

All parts of the scheme have been assessed as likely to have a neutral impact on the significance of the listed building. Overall therefore the scheme would have a neutral impact on the significance of the listed building.

## 7.3 Scheme Assessment Against Legislation and Policy

### Legislation

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

In determining such applications the following duty is placed upon the decision maker: *“Section 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.”*

We have assessed that the scheme would have a neutral impact on the significance of the listed building. The scheme would therefore accord with Section 16 of the Act.

### National Policy and Guidance: NPPF and NPPG

In line with Paragraph 194 of the NPPF, the significance of the potentially affected heritage assets has been outlined in Sections 5 and 6 of this Heritage Statement, including any contribution made by setting to the significance of the identified heritage asset.

In Section 7 we have also undertaken an assessment of the potential heritage impacts of the proposed scheme. We have shown in our Assessment of Heritage Impacts how the scheme has sought to minimise any heritage impacts and therefore satisfies Paragraph 195 of the NPPF. The design process has taken account of the key heritage principles of paragraph 197 and 199 of the NPPF. Clear justifications for those elements of the scheme likely to have a heritage impact, are also provided in the Assessment of Heritage Impacts (Section 7), as required under Paragraph 200 of the NPPF.

Having assessed the scheme as a whole, we have concluded in our report that the scheme would have a neutral impact on the significance of 25 Whitehall (Grade II listed).



## 7.0 Scheme Overview and Assessment of Potential Heritage Impacts

### Local Policy

For the reasons given above the scheme is considered to comply with London Plan Policy HC1 Heritage Conservation and Growth, as well as Westminster City Plan 2019-2040 Policy 38—Design Principles, Policy 39—Westminster's Heritage and Policy 40—Townscape and Architecture.

## 8.0 Summary and Conclusions

This Heritage Statement has been produced by Built Heritage Consultancy to accompany an application for Listed Building Consent for internal alterations at Flat 13, Craig's Court, 25 Whitehall, London, SW1A 2BS.

This Heritage Statement has assessed the significance of any on-site heritage assets and any in the surrounding area that might potentially be affected by the scheme proposals. It has also assessed the potential heritage impacts on the identified heritage assets in light of the proposed scheme.

### Legislation

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

We have assessed that the scheme would have a neutral impact on the significance of 25 Whitehall (Grade II listed). The scheme would therefore accord with Section 16 of the Act.

### National Policy and Guidance: NPPF and NPPG

In line with Paragraph 194 of the NPPF, the significance of the potentially affected heritage assets has been outlined in Sections 5 and 6 of this Heritage Statement, including any contribution made by setting to the significance of the identified heritage asset.

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Having assessed the scheme as a whole, we have concluded in our report that the scheme would have a neutral impact on the significance of 25 Whitehall (Grade II listed).

### Local Policy

For the reasons given above the scheme is considered to comply with London Plan Policy HC1 Heritage Conservation and Growth, as well as Westminster City Plan 2019-2040 Policy 38—Design Principles, Policy 39—Westminster's Heritage and Policy 40—Townscape and Architecture.

## Appendices: Appendix 1: Bibliography

This Heritage Statement has been produced predominantly using the sources listed below. Please also note the Historic England list entries provided at **Appendix 2** and the Legislation, Policy and Guidance set out in **Appendix 3**.

<https://www.stmartin-in-the-fields.org/historic-maps-of-the-parish-of-st-martin-in-the-fields/>

Trafalgar Square Conservation Area Appraisal

Whitehall Conservation Area Appraisal

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<https://www.stmartin-in-the-fields.org/historic-maps-of-the-parish-of-st-martin-in-the-fields/>

<https://www.british-history.ac.uk/survey-london/vol16/pt1/pp232-237>

[https://historicengland.org.uk/images-books/photos/englands-places/card/171326?place=Whitehall%2c+City+of+Westminster+\(Conservation+Area\)&terms=whitehall&searchtype=englandsplaces&i=7&wm=1&bc=0%7c585%7c588%7c589&g=4695](https://historicengland.org.uk/images-books/photos/englands-places/card/171326?place=Whitehall%2c+City+of+Westminster+(Conservation+Area)&terms=whitehall&searchtype=englandsplaces&i=7&wm=1&bc=0%7c585%7c588%7c589&g=4695)

Mary Evans Picture Library

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<https://www.britainfromabove.org.uk/en/image/EPW005728>

<https://www.britainfromabove.org.uk/en/image/EAW034936>

<https://historicengland.org.uk/images-books/photos/item/BL05201>

<https://www.maryevans.com/search.php?prv=preview&job=5471674&itm=141&pic=10412896&row=6>

<https://historicengland.org.uk/images-books/photos/item/IOE01/05496/33>



## Appendices: Appendix 2: Historic England List Entries

### 25, WHITEHALL SW1

25, WHITEHALL SW1

Official list entry

Heritage Category: Listed Building

Grade: II

List Entry Number: 1066104

Date first listed: 21-Aug-1975

List Entry Name: 25, WHITEHALL SW1

Statutory Address 1: 25, WHITEHALL SW1

Location

Statutory Address: 25, WHITEHALL SW1

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

County: Greater London Authority

District: City of Westminster (London Borough)

Parish: Non Civil Parish

National Grid Reference: TQ 30099 80296

Details

TQ 3080 SW CITY OF WESTMINSTER WHITEHALL SW1 83/51 (East side) 21-8-75 No 25 GV II Chambers, offices and shop. Mid C19 and c.1900 alteration and refacing of mid to later C18 houses. Portland stone narrow Whitehall front; stock brick north side and stock brick with red brick dressings to Craig's Court; slate roofs. 4 storeys and later attic. 1 window wide to Whitehall. Modern shop front to ground floor beneath entablature. 1st floor canted bay window with concave sides. 1st and 2nd floors flanked by giant Ionic pilasters supporting open segmental pediment framing triangular pedimented window of the original attic storey. North side of 4 storeys and dormered mansard; 9 windows wide irregularly grouped, plus a single bay return to the Whitehall facade with similar detail but with paired windows. Rear to Craig's Court (probably rebuild of C18 facade) of 4 storeys, basement and attic in mansard. 9

windows wide grouped in threes, the centre being a full height canted bay. Recessed plate glass sashes under flat gauged red brick arches. String courses to 1st and 3rd floors; parapet with coping. Included for group value only.

Listing NGR: TQ3009980296



# Appendices: Appendix 3: Legislation, Policy and Guidance

## Legislation

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

#### **Listed Buildings**

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for; *“(s.7) ... 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: *“Section 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 contains a similar duty, which states: *“In considering whether to grant planning permission ... for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

#### **Barnwell Manor Wind Energy Limited (2014)**

Recent case law has added clarification to the interpretation of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting. A particularly appropriate example of upholding a S66 is in the case of West Coast Energy’s proposal for five wind turbines to be installed within the setting of the Grade I listed Barnwell Manor, Northamptonshire. The National Trust advocated that the proposals would have an adverse impact upon the heritage asset’s setting and, reinforced by local opposition, the proposal was rejected by East Northamptonshire District Council in 2010.

The developers won an appeal for four turbines, however, this was overturned at the High Court who said the decision was legally flawed. A subsequent Appeal to

overturn the High Court ruling in was also dismissed in February 2014.

Lord Justice Sullivan held that, in enacting Section 66(1) of the Listed Buildings Act 1990, Parliament intended that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm. It should be given ‘considerable importance and weight’ when the decision-maker carried out the balancing exercise. It confirmed that ‘preserving’ meant doing ‘no harm’. But Lord Justice Sullivan said that this created a ‘strong presumption against the grant of planning permission’. It is that ‘strong presumption’ which made Barnwell stand out from earlier decisions.

The judgment found that the Inspector considering the appeal had not given special regard to the desirability of preserving the setting and had moved too swiftly to the balancing exercise under the NPPF.

#### **Mordue (2015)**

In *Mordue v Secretary of state for communities and local government* [2015], the claimant argued that the inspector had failed to apply the duty imposed by s.66 by neglecting to give “considerable importance and weight” to the acknowledged impact of a wind turbine on the setting of listed buildings.

The court allowed the claimant’s application. The inspector had referred to the impact on listed buildings but, applying the NPPF guidance, concluded that heritage issues were outweighed by the environmental benefits. However, there was no indication of what weight the inspector had given in each case or cumulatively.

The judge felt bound to follow the judgment in *East Northamptonshire v Secretary of state for communities and local government* [2014], which placed the onus of proof on the secretary of state to demonstrate that considerable importance and weight had been given to the impact on listed buildings, rather than on the claimant to establish that the decision was legally flawed. In *Mordue*, therefore, applying the NPPF alone was not sufficient, because it did not demonstrate that the required weight had in fact been given.

Notably, it was held that paragraph 134 (now Paragraph 196 in the Revised 2019 NPPF), read together with 132 and 133 of the Framework (now Paragraphs 193-195 of the Revised 2019 NPPF), lays an approach which corresponds with the duty

## Appendices: Appendix 3: Legislation, Policy and Guidance

in section 66(1) and a decision maker who works through those paragraphs in accordance with their terms, will have complied with the section 66(1) duty.

### Forge Field (2014)

Despite the decision in *Barnwell Manor*, the LPAs in the Forge Field and South Lakeland cases (decided in June and November 2014 respectively) fell into the same trap of carrying out a balancing exercise in accordance with Paragraph 134 of the NPPF (now Paragraph 196 in the Revised 2019 NPPF), after concluding the relevant proposal will lead to less than substantial harm to designated heritage assets, without *demonstrably* giving “considerable importance and weight” to the desirability of preserving those heritage assets. In both cases, the High Court quashed the grant of planning permission. However, it is clear from the *Babergh* case (decided in October 2014) that provided the decision-maker demonstrably has regard to the statutory duty in section 66(1) and/or section 72(1) of the Act when carrying out the balancing exercise pursuant to Paragraph 134 of the NPPF (now Paragraph 196 as above), the Courts are unlikely to interfere with their decision unless it is so unreasonable that no reasonable person could have made it.

### Steer v SSCLG (2017)

In this case the judge held, and upheld by the Court of Appeal in July 2018, that the Inspector erroneously concluded that a physical or visual connection was needed for an element to form part of the setting of a heritage asset. The inspector disregarded the existence of an historical, social and economic connection between the listed building and the site. This approach, it was held, was inconsistent with the broad meaning given to “setting” in the NPPF, the PPG and Historic England’s Historic Environment Good Practice Advice in Planning Note 3 (2017).

### Conservation Areas

The Planning (Listed Buildings and Conservation Areas) Act (1990) sets out regarding applications for planning permission within conservation areas that:

*“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character*

*or appearance of that area.”*

There is no corresponding statutory duty to have special regard to the desirability of preserving the setting of conservation areas.

## National Policy

### National Planning Policy Framework (NPPF) (Revised 2023)

The Government’s guidance in relation to conserving and enhancing the historic environment is set out in Chapter 16 of the Framework. Prior to Section 16 there are also some relevant paragraphs to heritage assets that will be provided below:

*“80. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*

*a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*

*b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*

*c) the development would re-use redundant or disused buildings and enhance its immediate setting;*

*d) the development would involve the subdivision of an existing residential building; or*

*e) the design is of exceptional quality, in that it: - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.”*

*“120. Planning policies and decisions should: ...*

*c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*



## Appendices: Appendix 3: Legislation, Policy and Guidance

*d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and*

*e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.”*

*“130. Planning policies and decisions should ensure that developments: ...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);...”*

*“149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: ...c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

*d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; ....”*

Section 16, Conserving and Enhancing the Historic Environment, contains for the following key paragraphs:

*“189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and 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.*

*190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

*a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*

*b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*

*c) the desirability of new development making a positive contribution to local character and distinctiveness; and*

*d) opportunities to draw on the contribution made by the historic environment to the character of a place.*

*191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.*

*192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:*

*a) assess the significance of heritage assets and the contribution they make to their environment; and*

*b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.*

*193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.*

### **Proposals affecting heritage assets**

*194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which*

## Appendices: Appendix 3: Legislation, Policy and Guidance

development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. 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.

197. 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.

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

### **Considering potential impacts**

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. Any harm to, or loss of, the significance of a designated heritage asset (from

its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, 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
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

203. 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.

204. Local planning authorities should not permit the loss of the whole or part of a

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*heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.*

*205. Local planning authorities should require developers 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. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.*

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

*207. 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 201 or less than substantial harm under paragraph 202, 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.*

*208. Local planning authorities should 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.”*

### Annex 2: Glossary (Part)

*“Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”*

### Local Policy

#### London Plan 2021

#### **Policy HC1 Heritage conservation and growth**

This policy states:

*“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*



## Appendices: Appendix 3: Legislation, Policy and Guidance

*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 Guidance 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 placemaking, and they should set out strategies for their repair and re-use.”*

### **Westminster City Plan 2019-2040**

#### **Policy 38—Design Principles**

This policy states:

*“Design principles*

*A. New development will incorporate exemplary standards of high quality, sustainable and inclusive urban design and architecture befitting Westminster’s world-class status, environment and heritage and its diverse range of locally distinctive neighbourhoods.*

#### **RESPONDING TO WESTMINSTER’S CONTEXT**

*B. All development will positively contribute to Westminster’s townscape and streetscape, having regard to:*

- 1. the character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them and the pattern and grain of existing streets, squares, mews and passageways;*
- 2. materials, building lines, scale, orientation, access, definition, surface treatment, height and massing;*
- 3. the form, character and ecological value of parks, gardens and other open spaces;*

*4. Westminster’s waterways and waterbodies; and*

*5. the preservation and enhancement of the surrounding tree population.*

#### **PEOPLE-CENTRED DESIGN**

*C. All development will place people at the heart of design, creating inclusive and accessible spaces and places, introducing measures that reduce the opportunity for crime and anti-social behaviour, promoting health, well-being and active lifestyles through design and ensuring a good standard of amenity for new and existing occupiers.*

#### **SUSTAINABLE DESIGN**

*D. Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design, including:*

- 1. use of high-quality durable materials and detail;*
- 2. providing flexible, high quality floorspace;*
- 3. optimising resource and water efficiency;*
- 4. enabling the incorporation of, or connection to, future services or facilities; and*
- 5. minimising the need for plant and machinery.*

*E. Applicants will demonstrate how sustainable design principles and measures have been incorporated into designs, utilising environmental performance standards as follows:*

- 1. Non-domestic developments of 500 sq m of floorspace (GIA) or above will achieve at least BREEAM “Excellent” or equivalent standard.*
- 2. Residential conversions and extensions of 500 sq m (GIA) of residential floorspace or above, or five or more dwellings will aim to achieve “Excellent” in BREEAM domestic refurbishment or equivalent standard.*

#### **PROMOTING EXCELLENCE IN CONTEMPORARY DESIGN**

*F. Imaginative approaches to contemporary architecture and use of innovative*

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*modern building techniques and materials will be encouraged where they result in exemplary new buildings and public realm which incorporate the highest standards of environmental sustainability, that respect and enhance their surroundings and are integrated with and better reveal Westminster's heritage and existing townscape."*

### **Policy 39—Westminster's Heritage**

This policy states:

*"Westminster's heritage*

- A. *Westminster's unique historic environment will be valued and celebrated for its contribution to the quality of life and character of the city. Public enjoyment of, access to and awareness of the city's heritage will be promoted.*
- B. *Development must optimise the positive role of the historic environment in Westminster's townscape, economy and sustainability, and will:*
  - 1. *ensure heritage assets and their settings are conserved and enhanced, in a manner appropriate to their significance;*
  - 2. *secure the conservation and continued beneficial use of heritage assets through their retention and sensitive adaptation which will avoid harm to their significance, while allowing them to meet changing needs and mitigate and adapt to climate change;*
  - 3. *place heritage at the heart of place making and good growth, maintaining the unique character of our heritage assets and delivering high quality new buildings and spaces which enhance their settings.*

#### **WESTMINSTER WORLD HERITAGE SITE**

- C. *The Outstanding Universal Value (OUV), authenticity and integrity of the Westminster World Heritage Site will be conserved and enhanced. The setting of the site will be protected and managed to support and enhance its OUV.*
- D. *Development will protect the skyline, prominence and iconic silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance identified views out of, across and towards the World Heritage Site.*

*E. The council will work with partners to promote the use, management and interpretation of the site in ways that protect, enhance and better communicate its OUV. The council will commit to lead the production and review of an updated World Heritage Site Management Plan.*

*F. Applicants will be required to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed, informed by Heritage Impact Assessment methodology and that any harm, including cumulative harm, has been avoided or justified.*

#### **LISTED BUILDINGS**

*G. Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric.*

*H. Changes of use to listed buildings will be consistent with their long-term conservation and help to restore, retain and maintain buildings, particularly those which have been identified as at risk.*

*I. Development within the settings or affecting views of listed buildings will take opportunities to enhance or better reveal their significance.*

*J. Demolition of listed buildings will be regarded as substantial harm and will be resisted in all but exceptional circumstances.*

#### **CONSERVATION AREAS**

*K. Development will preserve or enhance the character and appearance of Westminster's conservation areas. Features that contribute positively to the significance of conservation areas and their settings will be conserved and opportunities taken to enhance conservation areas and their settings, wherever possible.*

*L. There will be a presumption that unlisted buildings that make a positive contribution to a conservation area will be conserved, unless it has been demonstrated that the relevant tests in national policy have been met. Buildings which make a negative or neutral contribution may be replaced or refurbished where this will result in a high quality building which will improve their appearance in the context of the conservation area and their environmental*

## Appendices: Appendix 3: Legislation, Policy and Guidance

performance.

*M. The contribution of existing uses to the character, function and appearance of conservation areas will be considered and changes of use supported where they make a positive contribution to conservation areas and their settings.*

### ARCHAEOLOGY

*N. Westminster's Scheduled Monuments and their settings will be preserved, and opportunities taken to enhance and communicate their significance, where appropriate.*

*O. Applicants for development which involves excavation or ground works in Westminster's Archaeological Priority Areas or other areas suspected of having archaeological potential will demonstrate that they have properly evaluated the archaeological potential and significance of the site and assessed and planned for any archaeological implications of proposals.*

*P. Archaeological deposits will be preserved in situ wherever possible. Where it has been demonstrated that the conservation of archaeological remains in situ is impossible or deposits are considered to be of lesser significance, full investigation, recording and an appropriate level of publication and archiving will be required, including public display and interpretation, where appropriate.* REGISTERED HISTORIC PARKS AND GARDENS

*Q. Proposals affecting Westminster's registered historic parks, gardens and open spaces will safeguard their special historic interest, integrity, character and appearance, and protect their settings and significant views from and towards these spaces.* NON-DESIGNATED HERITAGE ASSETS

*R. Non-designated heritage assets (including local buildings of merit, archaeology and open spaces of interest within and outside conservation areas) will be conserved. When assessing proposals affecting non-designated heritage assets, a balanced judgement will be made regarding the scale of any harm or loss of the asset and the benefit of the proposed development."*

### Policy 40—Townscape and Architecture

This policy states:

*"Townscape and architecture*

- A. Development will be sensitively designed, having regard to the prevailing scale, heights, character, building lines and plot widths, materials, architectural quality and degree of uniformity in the surrounding townscape.*
- B. Spaces and features that form an important element in Westminster's local townscapes or contribute to the significance of a heritage asset will be conserved, enhanced and sensitively integrated within new development, including important architectural details, boundary walls and railings, historic roof forms or structures, open lightwells, historic or characteristic shopfronts and street furniture, as well as squares, parks and gardens. Where possible, lost or damaged features will be reinstated or restored.*

### EXTENSIVE DEVELOPMENTS

*C. Extensive development will maximise opportunities to enhance the character, quality and functionality of the site and its surroundings, including creating new compositions and points of interest, and high-quality new streets and spaces, linked to the surrounding townscape to maximise accessibility.*

### ALTERATIONS AND EXTENSIONS

*D. Alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings and spaces that contribute positively to Westminster's distinctive townscape.*

### ROOF EXTENSIONS

*E. Roof extensions will be supported in principle where they do not impact adversely on heritage assets and should:*

- 1. where part of a terrace or group already characterised by roof additions or alterations, be of appropriate design which follows an established form and*



## Appendices: Appendix 3: Legislation, Policy and Guidance

would help to unify the architectural character of the existing terrace or a group;

2. where part of a terrace with an existing roof line unimpaired by roof extensions, take a coordinated approach, adding roof extensions of consistent and appropriate design to each property across the terrace;
3. in other locations, be of appropriate design sympathetic to the architectural character of the existing building.

### WESTMINSTER VIEWS

F. New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible.”

### Guidance

#### **National Planning Practice Guidance (As amended)**

The NPPG provides added to clarity to the interpretation of the NPPF.

#### **Principles of Selection for Listed Buildings (2018)**

The Principles for Selection of Listed Buildings sets out that a building has to be of special architectural or historic interest to be listed compiled under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Listed buildings are graded to reflect their relative special architectural and historic interest.

- “Grade I buildings are of exceptional special interest;
- Grade II\* buildings are particularly important buildings of more than special interest;
- Grade II buildings are of special interest, warranting every effort to preserve them.”

“The Secretary of State’s policy is to provide as much clarity as possible about where the special interest of buildings lie when listing them or revising an existing

list entry. Section 1(5A) of the 1990 Act allows the Secretary of State to state definitively in a list entry if particular parts or features of the building (including any objects or structures that are fixed to it, or in its curtilage) are not part of the listed building or of special architectural or historic interest. Unless particular parts or features have been so excepted the protection conferred by listing applies to the whole of the building, not just its exterior....”

“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.”

“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

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*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.*

### **General principles**

#### Age and rarity:

*The older a building is, and the fewer the surviving examples of its kind, the more likely it is to have special interest. The following chronology is meant as a guide to assessment; the dates are indications of likely periods of interest and are not absolute. The relevance of age and rarity will vary according to the particular type of building because for some types, dates other than those outlined below are of significance. However, the general principles used are that:*

- *before 1700, all buildings that retain a significant proportion of their original fabric are likely to be regarded of special interest;*
- *from 1700 to 1850, most buildings that retain a significant proportion of their original fabric are likely to be regarded of special interest, though some selection is necessary;*
- *from 1850 to 1945, because of the greatly increased number of buildings erected and the much larger numbers that have survived, progressively greater selection is necessary;*
- *careful selection is required for buildings from the period after 1945, another watershed for architecture.*

#### Buildings less than 30 years old:

*Such buildings are not normally considered to be of special architectural or historic interest because they have yet to stand the test of time. It may nevertheless be appropriate to list some modern buildings despite their relatively recent construction – for example, if they demonstrate outstanding quality (generally interpreted as being equivalent to Grade I or II\*). The Secretary of State calculates the age of a building from the point at which the ground was first broken.*

#### Aesthetic merits:

*The appearance of a building (both its intrinsic architectural merit or any group value) is often a key consideration in listing, but the special interest will not always be reflected in obvious external visual quality. Buildings that are important for reasons of technological or material innovation, engineering or as illustrating particular aspects of social or economic history, may have little external visual quality but can still be of special interest.*

#### Selectivity:

*Where a building qualifies for listing primarily on the strength of its special architectural interest, the fact that there are other buildings of similar or identical quality elsewhere is not likely to be a major consideration. However, a building may be listed primarily because it represents a particular historical type to ensure that examples of such a type are preserved. Listing in these circumstances is largely a comparative exercise and needs to be selective where a substantial number of buildings of a similar type and quality survive. In such cases, the Secretary of State's policy is generally to list only the most representative or most significant examples of the type.*

#### National interest:

*The emphasis in this document is to establish consistency in selection to ensure that not only are all buildings of strong intrinsic national architectural or historic interest included on the statutory list, but also the most significant or distinctive regional buildings that together make a major contribution to the national historic stock. For instance, the best examples of vernacular buildings will normally be listed because they illustrate the importance of distinctive local and regional building traditions. Similarly, for example, some buildings will be listed because*

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they represent a nationally significant but localised industry, such as shoemaking in Northamptonshire or cotton production in Lancashire.

### State of repair:

the general state of repair and upkeep of a building will not usually be a relevant consideration when deciding whether it meets the test of special architectural or historic interest. The Secretary of State will list a building that has been assessed as meeting the statutory criteria, irrespective of its state of repair. Loss of original fabric will however be a relevant consideration when considering special interest.”

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

1 The purpose of this Historic England Advice note is to provide information on the analysis and assessment of heritage significance in line with the National Planning Policy Framework (NPPF) to assist owners, applicants, local planning authorities (LPAs), planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the NPPF and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice can usefully be read in conjunction with relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be acceptable, provided they are demonstrably compliant with legislation and national policy.

10 In summary, what is needed is an impartial analysis of significance and the contribution of setting . A Statement of Heritage Significance is not an advocacy document, seeking to justify a scheme which has already been designed; it is more an objective analysis of significance, an opportunity to describe what matters and why, in terms of heritage significance....

Where development proposals affect conservation areas, further advice on the appraisal, designation and management of conservation areas, including the assessment of special interest, can be found in Conservation Area Appraisal, Designation and Management: Historic England Advice 1 (Second Edition).

Assess the significance of the heritage asset For each heritage asset, describe the various interests (see PPG - paragraph: 006 reference ID: 18a-006-20190723):

- *Archaeological interest* There will be archaeological interest in a heritage

asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

- *Architectural and artistic interest* These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types.
- *Artistic interest* is an interest in other human creative skills, like sculpture. *Historic Interest* An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

3 *Impact on the significance* Where the proposal affects the historic fabric of the heritage asset, specify the effect on that fabric including loss or concealment of historic features and fabric which contribute to significance, both inside and out, proposed removals and demolitions and the impact of alterations and extensions, where proposed, etc. In some cases, condition and structural surveys may usefully be quoted, to explain why a particular course has been chosen. Where the proposal affects the setting, and related views, of a heritage asset, or assets, clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated. This may include the impact of the location of new development within the setting, of the impact on key views, the impact on the relationship of the heritage asset to its setting, etc. Where the proposal impacts both on the heritage asset directly and on its setting, a cumulative assessment of impact will be needed. Impacts both harmful and beneficial should be noted.

4 *Avoid harmful impact(s)* The NPPF stresses that impacts on heritage assets should be avoided. Therefore, show how the impact is to be avoided or minimised, for instance by the proposal being reversible. In some circumstances, the ability to appreciate significance may be enhanced or otherwise revealed by the proposal; this should be outlined here. As this may be a matter of the way the proposal has



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*been designed, reference in the Design and Access Statement (where appropriate) is likely to be useful.*

*5 Justification for harmful impacts This is the opportunity to describe the justification for the proposal.”*

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

This Historic England guidance note clarifies how to assess heritage asset significance, suggested archival sources of information, it recommends best practice recording procedures and discussed unauthorised works. It is a useful resource to aid with the interpretation of the NPPF.

#### **Cumulative Impact**

Paragraph 28 states: *“The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building’s plan form or an original designed landscape.”*

#### **Design and local distinctiveness**

Paragraph 53 states: *“Both the NPPF (section 7) and PPG (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, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, 2017 GPA Note 3 (Second Edition)**

The stated purpose of GP3 is to set *“...out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.*

*It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets. The guidance has been written for local planning authorities and those proposing change to heritage assets.*

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*It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, 2015 and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011)."*

A number of the key worthy sections are provided below for ease of reference.

### **"NPPF Glossary: Setting of a heritage asset"**

*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary)."*

### **"PPG: What is the setting of a heritage asset and how should it be taken into account?"**

*The "setting of a heritage asset" is defined in the Glossary of the National Planning Policy Framework.*

*A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.*

*Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.*

*The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

*The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that*

*setting. This will vary over time and according to circumstance.*

*When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306)."*

### **Views and setting**

*"The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.*

*Views which contribute more to understanding the significance of a heritage asset include:*

- *those where the composition within the view was a fundamental aspect of the design or function of the heritage asset;*
- *those where town- or village-scape reveals views with unplanned or unintended beauty;*
- *those with historical associations, including viewing points and the topography of battlefields;*
- *those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected;*
- *those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant."*

### **Setting and Views – A Staged Approach to Proportionate Decision-Taking**

*"...The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have*

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*the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (i.e. the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.*

*Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, paragraphs 131-135 and 137) [since amended in the Revised 2019 NPPF to 192-197 and 200 respectively]*

*Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:*

*Step 1: Identify which heritage assets and their settings are affected*

*Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated*

*Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it*

*Step 4: Explore ways to maximise enhancement and avoid or minimise harm*

*Step 5: Make and document the decision and monitor outcomes."*

### **Historic England: Conservation Area Designation, Appraisal and Management; Historic England Advice Note 1 (2016)**

AN1 provides guidance to LPAs on the management of Conservation Areas. It outlines best practice for their designation and for the production of conservation area character appraisals. The latter should be academically rigorous to allow the special interest of the conservation area in question to clearly intelligible to the reader and therefore be used as a guide to how sensitive to change relative parts of a conservation area are.

### **Historic England Advice Note 2: Making Changes to Heritage Assets (2016)**

The stated purpose of AN2 is to illustrate: *"...the application of the policies set out in the NPPF in determining applications for planning permission and listed building consent, as well as other non-planning heritage consents, including scheduled monument consent. It 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, based on the following types of heritage asset: buildings and other structures; standing remains including earthworks; buried remains and marine sites; and larger heritage assets including conservation areas, landscapes, including parks and gardens, and World Heritage Sites. It will be useful to owners, developers, local planning authorities and others in considering works to heritage assets."*

### **English Heritage: Conservation Principles, Policies and Guidance – For Sustainable Management of the Historic Environment (2008)**

Paragraph 31 states: *"Many heritage values are recognised by the statutory designation and regulation of significant places, where a particular value, such as 'architectural or historic interest' or 'scientific interest', is judged to be 'special', that is above a defined threshold of importance. Designation necessarily requires the assessment of the importance of specific heritage values of a place; but decisions about its day-to-day management should take account of all the values that contribute to its significance. Moreover, the significance of a place should influence decisions about its future, whether or not it is has statutory designation."*



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The values recommended to assesses in the guidance are provided below:

### **Evidential value**

*“Evidential value derives from the potential of a place to yield evidence about past human activity.”*

### **Historical value**

*“Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.”*

*“Illustrative value has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of a place. The illustrative value of places tends to be greater if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation. The concept is similarly applicable to the natural heritage values of a place, for example geological strata visible in an exposure, the survival of veteran trees, or the observable interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, a structural system or a machine might be said to have ‘technological value’.”*

*“Association with a notable family, person, event, or movement gives historical value a particular resonance. Being at the place where something momentous happened can increase and intensify understanding through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some semblance of its appearance at the time. The way in which an individual built or furnished their house, or made a garden, often provides insight into their personality, or demonstrates their political or cultural affiliations. It can suggest aspects of their character and motivation that extend, or even contradict, what they or others wrote, or are recorded as having said, at the time, and so also provide evidential value.”*

### **Aesthetic value**

*“Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.”*

*“Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. It embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship. It may extend to an intellectual programme governing the design (for example, a building as an expression of the Holy Trinity), and the choice or influence of sources from which it was derived. It may be attributed to a known patron, architect, designer, gardener or craftsman (and so have associational value), or be a mature product of a vernacular tradition of building or land management. Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.”*

### **Communal value**

*“Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.”*

73 Great Titchfield Street  
Fitzrovia  
London  
W1W 6RD

[office@builtheritage.com](mailto:office@builtheritage.com)

020 7636 9240

**Built Heritage**  
Consultancy