

ELLERAY HALL, ELLERAY ROAD
TEDDINGTON

**BUILDING OF TOWNSCAPE MERIT
REBUTTAL**

5 NOVEMBER 2021

GJHP

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1 INTRODUCTION

- 1.1 This rebuttal has been prepared by GJHP against the proposed designation of Elleray Hall (the 'Site'), Elleray Road, Teddington, as a Building of Townscape Merit ('BTM'). GJHP is a consultancy that provides expert advice on heritage and townscape matters.
- 1.2 The Sites does not lie in a conservation area and there are no statutory listed buildings in the area around the Site. The buildings adjoining the Site were designated BTMs in 1983. The closest conservation area is the Broad Street Conservation Area, designated in 2019, for which a comprehensive detailed appraisal was adopted, following public consultation, in 2021.
- 1.3 The report sets out the following:
- Relevant national and local policy and guidance;
 - A description of the Site and its heritage context;
 - An assessment of Elleray Hall against the Council's adopted criteria for inclusion on the Council's list as a BTM.
- 1.4 Reference should be made to the Heritage Assessment submitted with the application which assesses the effect of the application ref: 21/2533/FUL on heritage assets in the surrounding area. Council officers stated in their preapplication comments of 19 August 2020 that *'there is no objection to the loss of the existing building, which does not positively contribute to the local area'* (going on to say that *'any development must be a high standard of design that preserves the setting and significance of the adjacent BTMs'*) and accordingly the Heritage Assessment did not consider Elleray Hall any further.

2 POLICY & GUIDANCE

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

Heritage

- 2.2 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.
- 2.3 Heritage assets are defined in Annex 2 of the NPPF as a *'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*
- 2.4 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 189). It goes on to say that *'the level of detail should be proportionate to the heritage assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*
- 2.5 Paragraph 197 states the effect of an application on the significance of a non designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.

Planning Practice Guidance

- 2.6 The PPG includes a section called *'Historic environment'* which was updated on 23 July 2019. It explains which bodies are responsible for the designation of HAs and provides information on heritage consent processes.
- 2.7 The PPG defines non-designated heritage assets as *'buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets'*. It goes onto say, *'A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.198a-039 – revision date: 23 07 2019)*

- 2.8 With regard to non-designated HAs, the PPG notes that *‘there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.’* It states *‘it is important that all non-designated heritage assets are clearly identified as such’* noting it is *‘helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies’* (18a-040).

Regional planning policy and guidance

The London Plan 2021

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

Local policy and guidance

The London Borough of Richmond Upon Thames Local Plan (2018)

- 2.11 The Local Plan was adopted in July 2018. It sets out policies and guidance for the development of the borough over the next 15 years.
- 2.12 **Policy LP 4 ‘Non-Designated Heritage Assets’** states *‘the Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets’*, and that there will be a presumption against the demolition of Buildings of Townscape Merit.

Broad Street Conservation Area Statement

- 2.13 This comprehensive appraisal of the significance of the conservation area was adopted following public consultation in February 2021.

Broad Street Conservation Area Statement

- 2.14 The Conservation Area Statement explains why and when a conservation area was designated and includes a short history and description of the area, as well as a map showing the boundary. This is referred to where relevant in section 3 below.

Buildings of Townscape Merit SPD Adopted May 2015

- 2.15 In section 1, *'What are Buildings of Townscape Merit?'* the Council's SPD states, *'Many different types of buildings and structures are designated as being of townscape merit ranging from houses and cottages, which form the vast majority of entries, to shops, churches, public buildings, historic boundary walls, war memorials, underground buildings, railway stations and industrial premises. Buildings and structures of any age, even those of a recent date, can be included.'*
- 2.16 In section 2, *'Why has this list been made?'* it states, *'The related National Planning Practice Guidance (NPPG) notes that local planning authorities may identify non-designated heritage assets as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In the London Borough of Richmond upon Thames these buildings of local interest are called Buildings of Townscape Merit (other authorities may identify these as 'locally listed').'*
- 2.17 Paragraph 3.2 set out the criteria by which BTMs are designated:
- *'Any building or structure which dates from before 1840.*
 - *Later buildings or structures which are considered to be of definite quality and character, including the work of important architects and builders. Particular attention will be paid to buildings which:*
 - a) *Have important historic associations, in terms of famous people or events;*
 - b) *Illustrates an important aspect of social or economic history or use;*
 - c) *Represent an exceptionally good example of a specific and distinctive architectural style;*
 - d) *Demonstrate excellence in building craftsmanship, use of materials, technical innovation, architectural features and detailing;*
 - e) *Form part of a distinctive and cohesive group of buildings;*
 - f) *Retain its original architectural interest and integrity, and not subject to insensitive alterations;*
 - g) *Have landmark quality or make a unique and positive contribution to the quality of the townscape or an open space.'*
- 2.18 Section 4 sets out *'The Council's Approach to Buildings of Townscape Merit'* stating:

‘4.1 It is hoped that by drawing attention to the historic, architectural and townscape interest of such buildings and structures, owners and others will regard them more carefully when considering any proposals for alteration, extension or replacement. The removal of original or characteristic features, or the introduction of unsympathetic windows, doors or materials can not only destroy the visual quality of one building but erode the entire character and interest of an area. Many Buildings of Townscape Merit play a crucial role in the character of local areas. The sympathetic maintenance and adaptation of these buildings can preserve and indeed increase the attractiveness of an area.

4.2 It must always be borne in mind that these buildings and structures are not the same as listed buildings and that unless they are within a designated conservation area they enjoy no legal protection from demolition. There will always be a presumption against the demolition of Buildings of Townscape Merit. Consent for demolition will only be granted when the Council is assured that retention and adaptation is not possible and where the proposed replacement is consistent with other policies and exhibits a high standard of design that would complement the surrounding area. Indeed the Council will endeavour to protect the character and setting of all Buildings of Townscape Merit through negotiation of a sympathetic scheme, as far as possible treating proposals for works to or close to them as if they were listed buildings.’

Other guidance

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

- 2.19 The purpose of this note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding.
- 2.20 In terms of general advice on decision-taking, it notes at para 4 that, *‘The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance’*. The guidance goes on to suggest a number of common steps in assessing significance.

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

- 2.21 Historic England issued Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets in October 2019. The note covers the NPPF requirement that heritage significance is described in order to help local authorities make decisions on the impact of proposals for change to heritage assets. It states, in paragraph 2 of the introduction, that *'the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance'*. It describes a statement of heritage significance as *'an objective analysis of significance, an opportunity to describe what matters and why'*.
- 2.22 The advice note states that a staged approach to decision making, where the significance is assessed before the design of the proposal commences, is the best approach. It states in paragraph 29, under 'proportionality', that while *'analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance'*.

3 THE SITE AND ITS HERITAGE SIGNIFICANCE

Location

- 3.1 Elleray Hall, which provides day care and activities for the elderly, lies at the southern end of Elleray Road. The Site does not lie within a conservation area or contain any designated heritage assets.
- 3.2 There are two conservation areas, Broad Street and Park Road (Teddington), as well as a number of BTMs in the area around the Site. The effect of the proposed development on the Site on the setting of these was assessed in the Heritage Assessment submitted with the planning application.

The Site

- 3.3 Elleray Hall sits on a 0.13ha site with associated car parking. To the north it fronts Middle Lane, the hall building terminating the view south along Elleray Road. To the east and west it shares a boundary with nos. 15 and 21 Middle Lane respectively (both BTMs, see below). To the rear the Site shares its boundary with nos. 49 to 53 North Lane, and nos. 22 to 30 Park Place (BTMs, see below). The boundary to Middle Lane is poor quality and open to the east with a concrete post and chain link fence to the west.



Elleray Hall - the existing community building

- 3.4 Elleray Hall was constructed in 1911 and has been extended to the north, west and south-west following successive phase of works since this time. This is evident in the series of OS maps from 1914 onwards and noted in a comprehensive written account of the history of the community centre held at the LBRT local archives (see below). The hall was initially a parish hall connected with St. Peter and St. Paul's Church. It was in use as an engineering works in the 1950s and has been used as a

community centre, providing much needed local facilities, since the 1970s (Elleray Hall Social Centre).



View of rear of main building



Later extension to the rear



Brick extension to the front (east side)



Plain and undetailed east elevation of main building



Extension to west side, with later extension beyond



Extension to rear - west



Extension to rear - south

- 3.5 The building today provides poor quality outdated facilities. A Condition Survey undertaken in September 2018 found that the refurbishment of the building would not be the cost effective in respect to the longevity of the property. The executive summary outlined:
- Externally the property is in poor condition and external elements are widely deteriorated with replacement of flat roofs and windows (Main Hall) required urgently and extensive repair and redecoration of elements required.
 - Overall the building is reaching the end of its effective lifespan and will need a large investment over the 10-year period to replace larger elements which are reaching the end of their effective lifespan, with the replacement of cladding, flat roofs and windows are required in the immediate future.
 - A figure of £454,035.00 has been determined to be required to upgrade elements to 'Condition A'.
 - Noting the condition of the premises and remaining lifespan of many of the elements, partial or complete redevelopment of the property may be considered a more cost-effective option over the next 10 – 25 year life of the property.
- 3.6 Elleray Hall appears tired today and together with the poor quality boundary to the street detracts from the local area. Any value it has locally relates to its community use, and as noted above the building no longer offers accommodation of a suitable quality to provide community facilities for the elderly. The Council have stated in preapplication advice that *'there is no objection to the loss of the existing building, which does not positively contribute to the local area'* (going on to say that *'any development must be a high standard of design that preserves the setting and significance of the adjacent BTMs'*).
- 3.7 Elleray Hall is surrounded by BTMs, the most recent additions to the Council's list on Middle Lane added in 2017. These are set out below.

Heritage Context

BTMs

- 3.8 The Council's comprehensive BTM register lists the following buildings in the immediate area around the Site as BTMs, and these have been designated over a period of time from 1983 up to 2017:

- Nos. 13 & 15, and 21 to 27 (odd) Middle Lane were designated BTMs on 5 September 1983.
- Nos. 2 and 10 to 24 even Middle Lane were designated BTMs on 1 February 2017.
- Nos. 22 to 30 Park Lane were designated BTMs on 24 March 2005.

Broad Street Conservation Area

- 3.9 The Broad Street Conservation Area was designated on 20 February 2019. It is predominantly located along Broad Street and The Causeway, and the associated rear laneways.
- 3.10 The Council adopted a comprehensive Conservation Area Appraisal in February 2021. At the top of page 2 in a highlighted box it sets out the ‘*purpose of this document*’ as follows:

‘The principal aims of conservation area appraisals are to:

- *Describe the historic and architectural character and appearance of the area which will assist applicants in making successful planning applications and decision makers in assessing planning applications;*
- *Raise public interest and awareness of the special character of their area;*
- *Identify the positive features which should be conserved, as well as negative features which indicate scope for future enhancements.*

This document has been produced using the guidance set out by Historic England in the 2019 publication titled Understanding Place: Conservation Area Designation, Appraisal and Management, Historic England Advice Note 1 (Second Edition).

This document will be a material consideration when assessing planning applications.’

- 3.11 No reference is made to Elleray Road (other than as a photo caption of Broad Street properties), Elleray Hall or views towards it, nor is the Site shown on any of the historic or current OS maps in the document.

Historic development of the Site

- 3.12 The archaeology report submitted with the application notes the following:

‘5.3.4 A plan accompanying an 1872 sale catalogue for Elleray (Figure 6) depicts structures in both parts of the Site in detail; several structures were clustered in the southeast corner of the northern part of the Site (James’ Farm), and two small outbuildings are plotted for the first time in the southeast corner of the gardens within

the southern part of the Site. To the northeast of the Site, Ellery Villa is shown surrounded by grounds and accessed by a carriage drive from Broad Street, to the north of the house. The 1872 sale catalogue describes the villa as a residence 'built in the cottage style [...] with stabling, coach house, outbuildings, gardens, orchard, and lands' (Richmond Archives: LM/1382).

5.3.5 The 1896 Ordnance Survey map (Figure 7) shows that the villa known as Ellery did not survive until the end of the 19th century. The map shows that the house had been demolished to make way for Ellery Road, which was built along the line of the former carriage drive of the house and appears to have been under construction at the end of the 19th century. The 1896 map also shows that all of the structures associated with James' Farm had been demolished at the same time, although these had been replaced by a north-south aligned structure built along the western boundary of the Site, which survived well into the 20th century.'

3.13 It goes on to state 'The southern part of the Site changed substantially in the early part of the 20th century with the construction of Ellery Hall in 1911, which was initially a parish hall connected with St. Peter and St. Paul's Church (Ellery Hall Social Centre n.d). The Ordnance Survey 1920 map depicts the hall in the southern part of the Site with a smaller outbuilding to its southwest.'

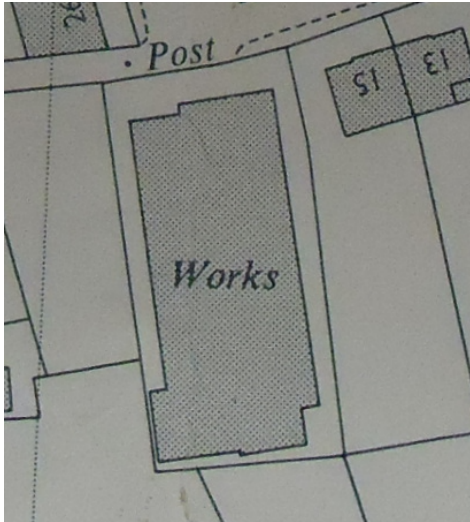
3.14 Ordnance survey maps (the images below are from the local archives) help understand how the building has been extended over time prior to its use as an engineering works in the 1950s. Further details on extensions in the post war years in 1969-1973, 1976, 1980 and 1993 are given below.



1915



1934



1962

LBRT Local Archives

- 3.15 A note held at the local archives, 'Teddington Old People's Welfare Committee and Elleray Hall Centre -A Potted History' by Vera Cameron (President/Hon. Secretary May 1993)' provides a comprehensive history of the use of Elleray Hall and its various extensions and upgrading (to meet varied use) from 1950s onwards, and the role the charity based there played in supporting the elderly in the local area. Those sections that refer to the building are summarised below (our underlining):

'Built in 1911 Elleray Hall (named after a house which stood on the site) had been a parish hall connected with St. Peter and Paul's Church. It was first used exclusively for the elderly, through TOPWC, in 1950, when a distribution of off-ration sweets was made to them – a most welcome concession in those luxury-starved days.

In 1952 it became an engineering works until they moved to Feltham, where they are still flourishing. The committee had long felt the need for a meeting place of its [word not legible] and accepted the Borough Council's offer for us to run a Day Centre on its behalf, which would give us the premises we so badly need. The immense structural alterations, floor strengthening, redecoration etc. needed to bring the building to a suitable condition took from 1969 to 1973, with inflation increasing the original estimated cost by stages from £6,000 to £28,000. A great deal of fundraising, and generous donations made by the late Sister Edna Black and the Independent Order of Forresters, complemented the Council's grant towards completion, and it was leased to TOPWC for a peppercorn rent.

So popular had the Centre become that in 1976 an extension was built for the membership of 544....

In 1977/8 complete redecoration of the hall was undertaken by Community Service Volunteers.

In 1979 the new lounge extension was begun, and officially opened on 15 March 1980...In 1988 30 new tables were donated and in 1990 TOPWC purchased new chairs to complement the major refurbishment of the hall...

Also in 1990 it was becoming apparent that we needed even larger premises to meet all the needs of its members, so a further extension was planned, completed this year [1993]...This provides an Activities Room, large Quiet Room, spacious lounge, hairdressing salon, shower room which will take chair bound members, medical and chiropody and an office exclusively for the bookkeeper who previously had to share'

- 3.16 We assess Elleray Hall against the Council's criteria for designating a BTM, as set out in the Council's BTM SPD, below.

Building typology - metal clad buildings

- 3.17 Metal clad buildings were a cheap alternative to more solid and permanent structures and were generally utilitarian in their design and finish. Those used as chapels, or 'Tin Tabernacles' as they are commonly known were a popular solution to providing cheap chapel and church accommodation from the mid 19th century onwards. Tin Tabernacles, an article by Liz Induni on building conservation online and reproduced from Historic Churches, 2002 notes:

'The very rapid growth in urban population during the Victorian era caused a new wave of church and chapel building. The advocacy of traditional materials by the Ecclesiological Society and architects such as Pugin, Street and Scott was irrelevant to the church needs of the poor or those at the margins of society. It was especially irrelevant to those settling at the frontiers of new lands in America and throughout the British Empire, and to the roving missionaries of every denomination.

In response to overwhelming pressures to provide cheap, rapidly erectable buildings that could be sited far from developed sources of traditional materials, it is no surprise that CI buildings started to be mass-produced by engineers and builders. They were made available for sale through catalogues. Each building type – cottage, railway station, church or house – was illustrated with a drawing and a price. Size could be altered according to need.

Prefabricated iron churches were relatively cheap to buy, costing anything from £150 for a chapel seating 150 to £500 for a chapel seating 350. Conventional building materials for the same would be considerably more expensive.

By 1875 hundreds of CI churches were being erected, many with extensive gothic style embellishments.'

- 3.18 Elleray Hall, dating from 1911, was not built as a church or chapel, and is much later in date than the principal phase of the picturesque church and chapel buildings from the 19th century that are the principal concern of this article. It is not considered to be of any historic interest meriting designation as a BTM as an example of a metal clad structure.

Assessment of Elleray Hall against the Council's criteria for designating BTMs

- 3.19 Paragraph 3.2 of the Council's BTM SPD sets out the criteria which need to be met for a BTM to be designated as follows:

- *'Any building or structure which dates from before 1840.*
- *Later buildings or structures which are considered to be of definite quality and character, including the work of important architects and builders. Particular attention will be paid to buildings which:*
 - a) *Have important historic associations, in terms of famous people or events;*
 - b) *Illustrates an important aspect of social or economic history or use;*
 - c) *Represent an exceptionally good example of a specific and distinctive architectural style;*
 - d) *Demonstrate excellence in building craftsmanship, use of materials, technical innovation, architectural features and detailing;*
 - e) *Form part of a distinctive and cohesive group of buildings;*
 - f) *Retain its original architectural interest and integrity, and not subject to insensitive alterations;*
 - g) *Have landmark quality or make a unique and positive contribution to the quality of the townscape or an open space.'*

- 3.20 Elleray Hall dates from 1911 and bullet point 1 does not apply - it is assessed against points a) to g) the 2nd bullet point below.

- a) *Have important historic associations, in terms of famous people or events;*

No important historic associations, in terms of famous people or events are known.

- b) *Illustrates an important aspect of social or economic history or use;*

The building was a cheap and quick solution to providing a church hall on a budget and is late in date and very basic as a metal clad structure. It does not illustrate an important aspect of social or economic history. Its importance lies in its community

use serving the elderly since the 1970s for which it has undergone successive extensions and alterations, and for which it is no longer fit for purpose.

c) Represent an exceptionally good example of a specific and distinctive architectural style;

Built in 1911, and altered over the years, Elleray Hall cannot be considered to be an ‘exceptionally good example’ of a community hall nor a metal clad structure. It is unremarkable both architecturally and in terms of the accommodation it offers as a community facility.

d) Demonstrate excellence in building craftsmanship, use of materials, technical innovation, architectural features and detailing;

Elleray Hall is late in date for a metal clad structure and was built as a hall (as opposed to a church or chapel) and as such was very plain even for a building of this type. It lacks features and detailing and shows no technical innovation. As a cheap structure, having been extended and undergone various extensive repairs and alterations over the years, it does not demonstrate excellence in craftsmanship.

e) Form part of a distinctive and cohesive group of buildings;

Elleray Hall sits at odds with its surroundings with earlier 19th century brick built houses either side. The latter, and many other buildings nearby have been designated BTMs over the years (as set out above) and the fact Elleray Hall has not, highlights how it does not have distinctive group value with these.

f) Retain its original architectural interest and integrity, and not subject to insensitive alterations;

Elleray Hall was not of any particular architectural interest when built, and any qualities it may have had before have been lost over the years through its extension and alteration.

g) Have landmark quality or make a unique and positive contribution to the quality of the townscape or an open space.’

Elleray Hall does not have landmark quality, which explains why no reference is made to it or of views of it, in the recent comprehensive appraisal for the Broad Street Conservation Area (nor was it included within its boundary when designated in 2019).

Summary

- 3.21 It is our assessment that Elleray Hall does not meet the Council's criteria for inclusion on the list of BTMs, as set out above. It is a plain, unremarkable example of a metal clad structure that has been extended and altered on many occasions since built in 1911. The Council stated in their preapplication advice of 19 August 2020 that *'there is no objection to the loss of the existing building, which does not positively contribute to the local area'* and there is no reason for this to have now changed. This corroborates our assessment that the building is not worthy of being designated a BTM, as does the fact that no mention is made of it in the recently adopted February 2021 Conservation Area appraisal for the Broad Street Conservation Area.

Planning Practice Guidance

- 3.22 The PPG which sets out the Government's planning guidance on heritage matters. It notes in respect of how non-designated heritage assets are identified that *'there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.'* It states *'it is important that all non-designated heritage assets are clearly identified as such'* noting it is *'helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies'* (18a-040). Elleray Hall was neither identified as part of the recent designation of the Broad Street Conservation Area, nor on the many occasions when neighbouring buildings were designated BTMs.
- 3.23 In terms of selectivity it states *'A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets (198a-039 – revision date: 23 07 2019).'* Elleray Hall, unlike many of its neighbours designated by the Council as non-designated heritage assets to date, does not have sufficient heritage significance to be designated a BTM.

Proposed Development of the Site

- 3.24 The Proposed Development is an intelligent and carefully considered response to the Sites and their heritage context. In respect of the design considered in its own right, and the relationship between the Proposed Development and its heritage context, the proposals are entirely sensitive and appropriate, and the effects are all positive. There are no harmful effects to the settings of any heritage asset.

- 3.25 Notwithstanding our assessment above that Elleray Hall does not warrant being designated as a BTM, were it to be designated a BTM its loss through demolition would be outweighed to a significant degree as part of a project that delivers new homes and a new purpose built community centre for the elderly, as required by paragraph 197 of the NPPF.
- 3.26 The Proposed Development is in line with relevant legislation, the policies and guidance on heritage set out in the NPPF and PPG; London Plan policies; Local Plan policies LP1 to 5; relevant SPDs; and HE guidance.

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5 November 2021