

24th May 2022

PLNCOmments@cityoflondon.gov.uk

Dear Madam / Sir,

**Planning Application 22/00323/FULL
Listed Building Consent Application 22/00323/LBC
Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL**

I am writing to OBJECT to these applications for the following reasons

- 1) The application is for temporary planning consent for 5 years — but involves destruction of two of the facades of a flat in a Grade II* listed building which is also the most highly designated asset in the Conservation Area. As the original fabric will not be replaced on the expiry of the consent this. It should not be described as a temporary consent.
- 2) The applicant declares that the works covered by this application are part of an analysis and development of options for the repair of Crescent House and an upgrade of thermal performance. Whilst repair and thermal upgrade are admirable objectives in themselves—and as a full-time resident of the building I am acutely aware of the need for both—destroying wholesale the fabric of a Grade II* listed building in a spirit of experiment appears cavalier, especially since less destructive strategies seem to be available and remain unexplored.
- 3) At no point does the application demonstrate the feasibility of thermal upgrades by means of alternative techniques such as dry-lining of existing fabric, upgrading glazing in window openings from single-glazed to double-glazed, the application of external thermal cladding to the ground/1st floor soffit and 3rd floor roof vaults.
- 4) In other words the Pilot premiates one particular option before a proper comparison with others is properly done.

Trial before roll-out

It is good practice and widely accepted with works to listed buildings that full scale mock-ups of critical elements are trialled where there a change of design and/or materials is proposed, so that these can be assessed alongside each other.

This was the approach at Great Arthur House on the Golden Lane Estate adjacent to the application property, where a 1:1 scale bay was fabricated and erected on site to demonstrate the impact of proposals, 'before' and 'after'. These were viewable side-by-side so that a comparison could be made. As a result of this 1:1 mock-up bay the design was modified in various small but important ways during and following the application process

and consultees (Historic England, C20 Society and resident stakeholders) had a secure basis for their judgements. Details such as windows openings could be assessed for ease of use; and larger townscape and architectural effects critical to the special character of the listed building, such as the reflectivity and colour of the double glazing units in natural light conditions could also easily be assessed. The eventual finished result at Great Arthur House is of benchmark standard (though the build-out was badly managed).

Although the present application relates to a building that is more highly designated (at II*) the so-called Pilot for trialing the project is nothing like as sophisticated as this successful mock-up and appears to trying to short-circuit the necessary work. This is because:

- One of the two options to be considered (see Schedule of works in design statement page 8) as part of this application project will be destroyed wholesale as part of the Pilot process.
- There will be no opportunity to see entirely new façade elements alongside double glazed repaired and upgraded elements. The only comparison will be with the existing fabric.
- The first of the two options listed (repair and upgrade - see Schedule of works in design statement page 8) is only being 'explored', presumably as a desktop exercise, and not constructed as a prototype, designed and drawn or apparently taken seriously; there are no construction details included in the present application.
- Though the application is to consider two options all of the drawings appear to relate to one option only, namely wholesale replacement of the façade.

Appraisal Methodology

In spite of a statement (Design Statement 2.0 page 5) that two options have emerged for the refurbishment of Crescent House there no indication of methodology for comparing the options nor what other options have been discarded, or why. The options and the methodology have certainly not been shared with stakeholders, especially the Crescent House Residents Group.

The Design Statement is misleading in giving the impression that the application supports examination and assessment of the two remaining options. The application is not even-handed with respect to the two short-listed options.

The Repair and Upgrade Option

The repair, upgrade and double glazing option—the first of the two listed in the Schedule of Works—has been shown to be feasible in principle in two flats in Crescent House where double glazing has been retro-fitted with improved window and door seals, etc. These are not to be considered as part of this consultation and will not be made available to residents and other stakeholders as part of the consultation because they are in privately occupied flats. However, they indicate a strong likelihood that repair and upgrade is feasible and attractive on grounds of cost, appearance and the extent of retention of heritage fabric. It is also more likely to achieving a high standard of finish because fine tolerance and high craftsmanship work will be directed on site, not in a remote building components factory. Nevertheless, work to the most recent of the two flats to be so fitted, was completed in one day. The standard of finish in the two flats upgrade using a repair and upgrade option is to such a high quality that it is very difficult to spot the upgrade.

The premise of the application is that the preferred option of the two has been selected without testing and justification in architectural, heritage or environmental terms.

During pre-application discussion between Historic England and the applicant HE made their position clear, namely that

“the replacement of the original windows would result in the loss of historic fabric. However, if it can be demonstrated that the windows are at the end of their functional life and/or are failing due to flaws in the original design (such as at Great Arthur House), this could form the basis of the necessary justification for these proposals.” (HE letter of advice to City of London dated 08 May 2019 ref Our ref: PA00976171)

The present application does not provide such a justification; indeed the 100% close in section window survey found exactly the opposite; namely that the faced and windows were capable of repair. It is surprising that this survey is not mention and that it is not appended to the application, since it was commissioned for this purpose.

It appears that the present application is flying in the face of advice from the Government's statutory heritage advice agency.

Heritage Significance

The City as applicant was made aware of the particular importance of Crescent House as a result of its pre-application discussion with Historic England who wrote to the City confirming that Crescent House

“is one of the jewels in the crown of the City of London's architectural legacy and widely admired for its unique style and innovation. It illustrates in built form, the development of CPB's ideas which is highly significant given their key role in the evolution of post-war architecture in Britain. Its status as a grade II listed building reflects this.”* HE letter of advice to City of London dated 08 May 2019 ref Our ref: PA00976171)

In the light of this it is very surprising that the Heritage statement associated with this application to destroy wholesale both facades of one flat is not a more thoughtful and sophisticated document. It is also surprising that conservation accredited architects have not been employed and that no heritage advice is included in the application.

As the application involves wholesale demolition of two of the facades (front and back) of this flat and their replacement with a replacement that is not an accurate replica the application amounts to substantial harm to the heritage asset. For a heritage asset the starting point is that such loss is always unacceptable if there are other options.

Even if environment benefits accrue (and these are not specified or benchmarked in the application) they must be weighed against the substantial harm to the designated building arising from wholesale destruction of the two public faces of the flats. No such weighing is evident nor is there the requisite 'clear and convincing justification' (NPPF, par 200) is found in this application for the Pilot. The information and justification should be 'proportional to its significance' (NPPF para 194) and for a Grade II* listed building the application does not provide this. It should, for example be a more thorough process and trailing than that for

Gt. Arthur House, briefly outlined above. In fact it is a poorly considered and less-convincing process for Crescent House, the more highly designated building.

Inadequate Information Provided

The information provided in support of the application is lacking in detail.

For example:

- The Heritage Statement makes no attempt to identify the reasons for the heritage significance ascribed. There are ample sources, from the remarkably (and unusually) extensive list description to the thorough two-volume Golden Lane Estate Listed Building Management Guidelines (the latter adopted as supplementary planning guidance for the site). For a Grade II* building in the City I would expect to see this level of research and assessment
- There is no attempt to establish the fragility of the heritage significance, which is very surprising in an application to destroy such an extensive amount of fabric and replace it with non-replica designs.
- The overlay technique used on the drawings of the scheme, of before and after, make it very difficult indeed to assess the visual impact of the proposed works.
- None of the drawings relates to the first option being considered under the Schedule of Works: repair and upgrade with double glazing.
- There is no indication of the repair methods to be adopted for the first option being considered or how outcomes might be assessed.
- There is no stated benchmark for the thermal performance of either option.
- There is no weighing exercise in which the self-evident severe harm to the listed fabric might be justified, as is required by the NPPF.
- There is no learning from the two flats that have been retro-fitted with improved thermal performance and bespoke prefabricated double-glazed units.

Maintenance & Repair

The history of poor maintenance of Crescent House (and other buildings on the Golden Lane Estate) by the City of London is well documented. Most relevant to the present application is the 100% Close Inspection Survey commissioned in 2021 from Hallas & Co Surveyors (March 2020) which is referenced in the application, but not appended. This examined 100% of windows externally and a sample of 15% of flats internally. It indicated that 85% of the original façade timber would remain if the windows were repaired rather than replaced. Notwithstanding serious localised rot in areas where weather is harsh the remainder may be repaired as part of a façade upgrade. This survey evidence, commissioned by the applicant in preparation of this application, does not support wholesale destruction of the façade. The survey should be attached to the application nevertheless, inconvenient though it may be to the case made in the application.

Poor maintenance by the City as freeholder of the Golden Lane Estate has been especially egregious in the case of Crescent House. The coating of the windows in waterproof paint about 25 ago as part of a maintenance project has exacerbated decay by rot, because it has trapped water and because the brown painted surface has not been re-coated or maintained in 25 years. Indeed no building-wide maintenance or cyclical repair of the façades has been

undertaken for 25 years, at least, when a cycle of 6 or 7 years is the typical professional standard for this type of building. (It is puzzling to know why, since the City has a well-developed and effective rolling programme of maintenance for African hardwood windows across the Barbican Estate immediately adjacent, and this does not utilise brown vapour barrier paints or other inappropriate techniques).

It is well established in respect to listed building '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' (NPPF para 196).

Design Details - Ventilation

Many flats (this may apply to about half of flats) in Crescent House have internal kitchens that require mechanical ventilation to meet statutory standards. The original ventilation was removed by the applicant body in the last five years and not replaced. The applicant is without a strategy for the necessary mechanical ventilation for these flats. Though it is assumed that top floor flats such as no. 347 will use openable windows as the means of ventilation the application should show how mechanical ventilation will affect the amenity and appearance of flat 347 and other top floor flats. Ventilation proposals from the applicant body (installed without benefit of Listed Building Consent so now removed) were designed to exhaust near the openable windows of top floor flats including 347 and would have impaired both the amenity by reason of smells and vibration, as well as the appearance of the building generally. Without an effective ventilation strategy, the proposals do not enable the heritage asset to contribute to a sustainable community (NPPF para 197b).

Design Details - Boiler Flues

Crescent House, in common with many other social housing blocks built in the same period (1959-61), performs poorly thermally and this presents severe difficulties for residents, well above half of whom are in low income brackets. The problem has been severe since the City of London disconnected the original underfloor heating system in Crescent House utilising an Estate-wide boiler room. This disconnection was abrupt and undertaken without a viable alternative heating strategy.

The Crescent House Resident Group Survey indicates that 61% of residents use gas boilers to heat their units and these invariably vent to atmosphere via the facades. There is no indication in the application about how individual gas boiler flues are to be dealt with.

Even allowing for survey error and changes in resident preferences, this is a serious issue, since flues passing through the external façade will affect the claimed thermal performance and will adversely affect appearance of the building. The applicant is without a strategy for existing flues, or those installed in future. Without a heating strategy the proposals do not enable the heritage asset to contribute to a sustainable community (NPPF para 197b). Given thermal efficiency is an important pretext for the scheme this is a serious omission.

Design Details – Solar Gain

The application is silent on severe problems of solar gain, which is especially acute in the upper two floors and on the elevations of the building facing Aldersgate Street/ Goswell Road / Fann Street where opening windows is not an acceptable way to address overheating

since these windows overlook a busy, noisy and polluted road (namely the A1, a major network route road from London to Edinburgh). In the Crescent House Residents Group survey 27% of resident scored solar gain highly as a problem and as this related primarily to Westward facing flats, it is probably a majority of residents that are badly affected on the elevations facing sun.

Design Details – rainwater

It is not clear how the reconstructed Oriel roofs are to shed rainwater. No drainage spouts are shown and since an upstand is introduced to the roof detail ponding will result. Moreover the fall to these oriel roofs has the effect of making the leading edge of the roofs thinner in the highly important elevation to Aldersgate Street/Goswell Road. Though the roofs have been recovered in metal with upstand seam, this fall appears to be derived from the original design intention of giving the roofs an elegance that will be lost if the roofs are flat. If they are given an upstand as well this clumsy and inelegant detail will be further worsened. For reasons of the appearance of the important elevation and to deal properly with rainwater the present design is inadequate.

Summary

Flat 347 is located within a Grade II* listed building. The removal of most of the fabric of two elevations of this flat amount to substantial demolition of a listed structure, an 'irreplaceable resource' that should be conserved 'in a manner appropriate to its significance'. (NPPF 2021 para 198).

This application must meet a high threshold and as the grade of listing is higher than other heritage assets on the Golden Lane Estate the weight given to conserving the special character of the asset must be proportionally higher (NPPF para 199).

The present application fails to make a 'clear and convincing justification' required by the NPPF because it gives undue weight to just one option of two considered; and because it fails to show the benefits of the option premiated.

The option premiated is the most destructive in terms of fabric and character; it does not address the presenting problems of disrepair through neglect and poor thermal performance in a consistent and appropriate way appropriate to a grade II* listed building in a Conservation Area.

I urge you, therefore, to REJECT this application

Comments for Planning Application 22/00323/LBC

Application Summary

Application Number: 22/00323/LBC

Address: 347 Crescent House Golden Lane Estate London EC1Y 0SN

Proposal: Replacement of existing single-glazed windows to Flat 347 with triple glazed windows, together with installation of insulation to internal walls of flat (temporary consent for 5 years).

Case Officer: Amy Williams

Customer Details

Name: Mr Ognjen Ristic

Address: 317 Crescent House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I am writing to object to application 22/00322/FULL for the following reasons:

1) Destruction of existing heritage - The applicant has provided insufficient justification as to why the existing façade is not fit for purpose and has to be removed and replaced entirely. The condition survey carried out by the council had determined that the façade did not need replacing and could be refurbished.

2) Applicant should do an initial exploratory application to test out upgrading of existing frames to double or vacuum glass prior to taking this destructive work on - Unlike situations with traditional sash windows in listed buildings the upgrade to double or triple glazing of these existing window frames is very straightforward. They are deep enough to actually allow for an upgrade without the removal of the entire façade.

3) Applicant should provide details of how they will return the façade back to original following the trial

4) Installation of new window ironmongery which go against the character of the existing windows by introducing surface mounted trickle vents, off the shelf handles, casement stays and the like. Refer to page 10 of document and supplied details. The applicant should provide further details on the ironmongery intended for the application as part of the application. The ironmongery alongside the frame design is what makes the scheme unique.

5) Installation of triple glazed windows using off the shelf profiles with single points of seal rather than two or three as would be expected for this type of construction. This detail suggests that the applicant is carrying out a tick box exercise, i.e. ticking of triple glazing, more possibly for publicity rather than intent. The window frame design should be bespoke to match the existing. If trickle vents are to be required then they should be designed to be concealed within the frames (since

they are going through all the effort and removing the frames)

6)The roof of the oriel window needs further development

8 June 2022

The City Of London
Guildhall
Sent by email to PLNCOmments@cityoflondon.gov.uk

Topic: Objections to both Planning Application 22/00322/FULL and Listed Building Consent Application 22/00323/LBC

Dear Sirs/Madams

I am writing to OBJECT to both Planning Application 22/00322/FULL and Listed Building Consent Application 22/00323/LBC.

The applications are titled: "Replacement of existing single-glazed windows to Flat 347 with triple glazed windows, together with installation of insulation to internal walls of flat. Temporary planning permission for 5 years".

These applications are not about replacing single glazed windows but destroying a façade. The windows are the curtain walls. The application is trying to downplay the reality of the massacre or Crescent House the Major Works Team of the City and Studio Partington are orchestrating.

The applications are a deliberate attempt to dilapidate of an historic Grade II* building, the only residential Grade II* building in the City and one of the rare examples of residential post war brutalist architecture in London and the UK. The planned work is nothing short of environmental, historical, financial, and architectural vandalism. The works proposed are consistently and systematically in opposition to all the advice given to the City by its own experts on repairs, maintenance and respect for the fabric of the building. The works proposed run roughshod over the 2008 and 2013 City of London Golden Lane Listed Building Guidelines.

The suggestion of installing a triple glazing will not resolve any of the issues listed on the application: noise, thermal improvement and ventilation. Noise affects the flats on Goswell Road, the ones on the courtyard side are quiet. A triple glazing would improve thermal insulation in the winter but will make the flats unliveable in the summer. Issues of condensation in the flats are not due to single glazing but lack of ventilation which is a behavioural problem as well as a reluctance to open the windows to air the properties due to noise and pollution from Goswell Road. I have no condensation in my flat, because I ventilate the property. Were the City serious about the welfare of its tenants, it would reduce traffic on Goswell Road, which would enable the residents to open the windows and ventilate the flats. This would reduce the noise nuisance as well.

The consequences for the City of the work proposed will be manifold, from potential criminal proceedings for having destroyed the fabric of a Grade II* listed building to lawsuits from the residents and leaseholders for the damage done, the loss of value of the properties and failing to abide by the terms of our leases or peaceful enjoyment. The City has lost its reputation and the legal case against the residents of Great Arthur House, is it ready for a second round?

Further comments include:

- 1) Notifications, Dates and Deadlines

The application was received on 25 April 2022, validated on 9 May, with a consultation period from 13 May to 10 June. Notices were sent to neighbours and leaseholders around 13 May, and notices went up on Goswell Road dated 19 May. There is a profusion of dates, none of them line up. No letters were sent to leaseholders and non-residents by mail, a number of our neighbours have complained of not being informed by the City. Is this a deliberate attempt from the City to create confusion about the deadline for comment?

On a procedural ground only, these applications must be withdrawn.

2) Heritage statement Studio Partington dated 5 May 2022

Despite claiming to want to respect the nature of the Grade II* listing, Studio Partington goes on to recommend no less than destroying the façade by destroying all the detailing and historic fabric. This is a remarkable position to take and will lead to a criminal offence. The losses include:

- all the timber frame
- removal of ventilation profiles
- changing the profile of frames
- changing the profile and design of the oriel
- the aluminium windows
- the central pivot and design of aluminium windows
- the spandrel
- the shelving
- all the detailing of the panelling and frames
- all the ironmongery

In short, Studio Partington is suggesting a systematic and thorough destruction of the façade of flat 347. How can the City and Studio Partington claim to follow the guidelines of the City and Historic England while destroying some much heritage?

Studio Partington asserts that the dismantling of the existing frames will enable a thorough assessment and record of the condition of the frames. That will certainly destroy them. As for assessing the frames, any good heritage joiner will be able to do this without destroying the frame. Studio Partington claims to be respecting the design intent of Chamberlin Powell and Bon while destroying their work. This is a serious case of cognitive dissonance.

3) Letter from Grade dated 20 April 2022 and signed by Ben Rogers

This letter is web of untruths. Let's unpick them.

Mr Rogers asserts that the City has conducted consultation with residents. It is true that events have taken place, these were tick boxes exercises to be seen to satisfy a process. The residents have repeatedly told the city we did not want new windows not double/triple glazing, we wanted the original windows to be repaired and maintained as per the terms of our leases. The City and Mr Rogers are ignoring any feedback we have given. Our feedback was and is clearly opposed to the works proposed in these applications.

Grade mentions the City's Climate Action Strategy. This is a faddish strategy that will go out of fashion as quickly as it has been embraced. Restoring historical building needs to go beyond the latest buzzwords and preserve the heritage for future generations. The City owns many properties in London, Crescent House is only one of many. The City only owns 50% of the flats of Crescent House. Therefore, the contribution of Crescent House to net zero fantasy target will be irrelevant, but damage done to the fabric of the building immense.

Grade mentions that the residents of Crescent House will be as little impacted by the works as possible. They have not done any impact assessment.

Grade mentions that through the destruction of the windows they will be able to assess them. Destruction to assess if something works? This is an interesting concept.

Grade claims that the new windows match the existing profile, that is blatantly untrue when looking at the drawings provided.

Grade claims the planning application is for 5 years only and that the windows might be replaced. The application does not contain any information about how the windows will be replaced once they are destroyed.

Grade claims that the interventions will ensure minimal impact that is not true, the work is designed to have maximum impact.

Grade refers to a Climate Action Strategy but does not explain which aspect of the strategy is relevant to Crescent House and how the work will contribute to it.

Grade mentions that the Design and heritage Statement explains how the proposals will enhance the thermal performance of the building. The Statement does make assertions but does not justify them. These are empty promises.

The Letter from Grade is a web of deceitful statements.

4) Carbon footprint

The proposals insist on contributing to a vaguely defined Climate Action Strategy. As mentioned above, the works at Crescent House will not contribute much to the ill-defined strategy of the City. What is certain is that the destruction of the fabric of the walls (without accounting for their replacement at this stage) will have a carbon footprint much higher than repairing it. The carbon footprint of the project (windows removal+new windows) is gigantic and has not been assessed accurately by the Major Works Team. Sapele is a very expensive wood both financially and environmentally. Sapele is a hardwood listed on the IUCN red list as threatened timber species. It is wilful environmental vandalism to destroy existing Sapele frames and replace them by new ones. Is the City ready for the reputational damage this will trigger?

5) Timelines

The proposals mention development dates for 1 Phase from June 2022 to August 2022: it is impossible to carry out the work in such timeframe and raises questions on the intent of the application.

6) Execution and disruption

The applications do not mention anything about how the works will be carried out, the need for scaffolding, the disruption to the commerce on the ground floor and to the residents.

A thorough analysis of the structure of the building does not require the destruction of the windows nor their removal. It is perfectly possible these days to analyse a building and its windows without removing them.

The financial cost of destruction and replacement of the windows is set at £2MM, which is astronomical for a project that has been priced previously at £35k.

In conclusion, this Pilot project is not necessary to evaluate the state of the windows of Crescent House.

This application should be withdrawn as it is disingenuous and clearly intending to obfuscate a very serious issue. It is very poorly thought through. The City should expect better from its employees and contractors.

This application should be struck down as it is supporting acts of vandalism: environmental, financial, against our heritage, historical, legal. Should the City approve the application it would be complicit in destroying the fabric of a Grade II* building which is a criminal offence. Once these applications are voted down or withdrawn, a working party between the leaseholders and the City must be set up with external experts to schedule a maintenance (no replacement) plan that will upgrade the facades. The upgrading to triple glazing should be optional.

Philippe Rogueda

From:



Subject:

Planning Application 22/00322/FULL Listed Building Consent Application 22/00323/LBC Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL

Date:

09 June 2022 19:33:04

THIS IS AN EXTERNAL EMAIL

Dear Sir/ Madam,

Planning Application 22/00322/FULL Listed Building Consent Application 22/00323/LBC Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL

I am writing to object to these planning applications.

I feel that this application is a way for my landlord to push their preferred triple glazing scheme without listening to the residents who live in this building. Retro fitted double glazing is completely feasible and can be done in a very short space of time and without all the upheaval this project will undoubtedly entail.

A survey taken by the COL on the condition of the windows in Crescent revealed that 85% of them were sound. I do not understand why they are not using a case by case scheme to look at each of the flats and determine which windows need repair and which windows need to be replaced, surely a more cost effective option and more sustainable than cutting down trees in Africa.

It would be far better to make a mock-up of a triple glazed Crescent house window that residents could view in the community centre (as was done for Great Arthur House) rather than remove a grade II * listed facade to achieve the same ends.

We already live in a fairly small space and the proposed plans will reduce the floor space further.

For residents like myself who live on the first floor our main loss of heat is through the floor as I live above a void. There has been no commitment to insulate the colonnade soffit below.

I have lived in Crescent house for over 20 years and am proud of its listed building status and feel this ill thought out project will undermine that status and deliver something that the majority of us residents do not want.

Yours Sincerely,

Matthew Carter

106 Crescent House
Golden Lane estate,
London
EC1Y 0SJ

Comments for Planning Application 22/00323/LBC

Application Summary

Application Number: 22/00323/LBC

Address: 347 Crescent House Golden Lane Estate London EC1Y 0SN

Proposal: Replacement of existing single-glazed windows to Flat 347 with triple glazed windows, together with installation of insulation to internal walls of flat (temporary consent for 5 years).

Case Officer: Amy Williams

Customer Details

Name: Ms Jacqueline Swanson

Address: 324 Crescent House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am writing to OBJECT.

Whilst I very much welcome the exploratory pilot project I believe at this stage replacing the existing single glazed windows with triple glazed is unnecessarily destructive, and wasteful.

With reference to the Design Statement / Report:

4.0 Proposed Schedule of Works

e) Try to increase rebates of the frame and add double glazing

If the applicant is successful in increasing the rebates then residents would prefer the applicant to retain the double glazing in situ, replacing only those windows that are necessary. A stand alone mock-up of triple glazed window panels should be made available which could quite easily be installed in the void flat for direct comparison to the double glazed windows installed in the repaired (where necessary) window frames.

This allows for all the environmental and acoustic assessments to be made with the option that creates the least damage to the fabric of this grade 2* listed building. Triple glazing will materially change the look of the exterior and interior and residents have consistently fed back to the City that they want this avoided unless absolutely necessary. It's nothing short of an act of environmental and aesthetic vandalism to rip out the windows of any property and replace with triple glazed windows without evidence of the absolute need to. How can assessments of the void with triple glazing give us any idea of how double glazing will work?

Unfortunately, the applicant has to date failed to give residents a cogent explanation as to why triple glazing is preferable to double glazing and so we must first determine whether double glazing is adequate. Our environmental obligations are not just about ticking boxes.

The windows programme is ay behind schedule and residents are very keen to have warm, well insulated homes particularly as we face rising fuel costs. It is a shame that the applicant is not offering an approach that residents can support. We should be working together on this.

Steve Smith
301 Crescent House,
Golden Lane Estate,
London EC1Y 0SL

11th June 2022

PLNCOmments@cityoflondon.gov.uk

Dear Madam / Sir,

Planning Application 22/00323/FULL
Listed Building Consent Application 22/00323/LBC
Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL

I am writing to object to these applications for the following reasons. Please refer to the visuals and photos on the following pages.

1) Loss of original detail and craftsmanship internally

The original windows are of very high quality, both in terms of the materials used and the craftsmanship of the joinery. The geometry of the facade is complex, with numerous junctions and details that are carefully considered and resolved with great skill by the original architects and joiners. This finely crafted joinery has great value and, where cared for and maintained, is a joy to look at and brings great pleasure to the occupants of the flats on a daily basis.

It would cause substantial harm to the heritage value of the flats to lose this irreplaceable craftsmanship.

The detailed drawings submitted show that the proposed facade will look very different internally. The original rebated reveals around each frame and the symmetrical shadow gaps surrounding the pivoting windows will be lost. The carefully balanced proportions of the frame thicknesses will also be lost. All original ironmongery will be lost. The minimal frame at the curved barrel vault which currently allows the visual continuation of the vault from inside to outside will be lost, both in the main living space and on the kitchen side. The addition of bulky internal insulation strips to the soffit and walls will be unsightly.

Please see photos and side by-side comparisons on the following pages for reference.

2) Environmental responsibility

The condition survey (Hallas & Co, March 2020) has established that repairing the facade is viable. Improving the energy efficiency of the facade is a laudable aim, but this cannot be used to justify such significant harm to the building when there are viable alternatives.

This is especially the case when it appears that there has been no calculation of Embodied Carbon (also referred to as 'up-front' carbon) carried out for this proposal. Without this calculation it is not possible to know the whole-life carbon impact of the project.

The act of replacing the facade will use a significant amount of carbon, from cutting down trees, manufacturing, transport and site activities. Carbon will be saved each year from reduced heating requirements, but without a rigorous whole-life carbon assessment it is not possible to say if these

savings will outweigh the original carbon cost of the installation.

Following the principles of 'RetroFirst', an upgrade to the glazing within the existing frames alongside repair as necessary, would achieve significant improvements in energy use, acoustics and solar control without the enormous carbon cost of a wholesale facade replacement.

(One flat in Crescent House has already taken this approach, upgrading to double-glazing within the existing frames. It has listed building consent. There is a photo for reference on the last page of this objection).

Note that Flat 347 is a west-facing top-floor flat and, in common with all flats of a similar orientation, suffers from severe overheating during the summer months. Solar coating to the glass will be required to mitigate this, which will appear quite different to the current single glazing. The visual impact of this does not appear to have been considered as part of the application.

3) Loss of area and disruption internally

In a number of areas, the submitted details indicate that floor area will be lost inside the flats to accommodate wider frames and insulation.

Even a modest area loss is highly undesirable; these are small flats and every bit of space is precious.

Encroaching into the flats will bring further complications in terms of interfaces with flooring materials, built-in joinery and other features, adding significant repair costs and complexity to the project.

4) Precedent for future applications

If approved, the obvious and significant harm caused to the original fabric of Flat 347 as part of this application will set a damaging precedent.

The bar will be lowered for any future applications wishing to change the fabric of the building, whether related to the windows project or not, and this will lead to an acceleration of the degradation of Crescent House.

5) Working Collaboratively

It is concerning that the applicant has chosen to pursue a full-facade replacement option via a destructive mock-up process, despite the major shortcomings outlined by residents and others since the start of the project.

I fear a fraught and ultimately unsuccessful project lies ahead unless we can work together in our common interest. All of the above objections could be avoided with a carefully designed refurbishment option and I would urge the project team to focus their efforts on this approach.

Regards,

Steve Smith



PHOTO TO SHOW QUALITY OF EXISTING JOINERY



PHOTO TO SHOW QUALITY OF EXISTING JOINERY



PHOTO TO SHOW QUALITY OF EXISTING JOINERY

Analysis of Key Details



01

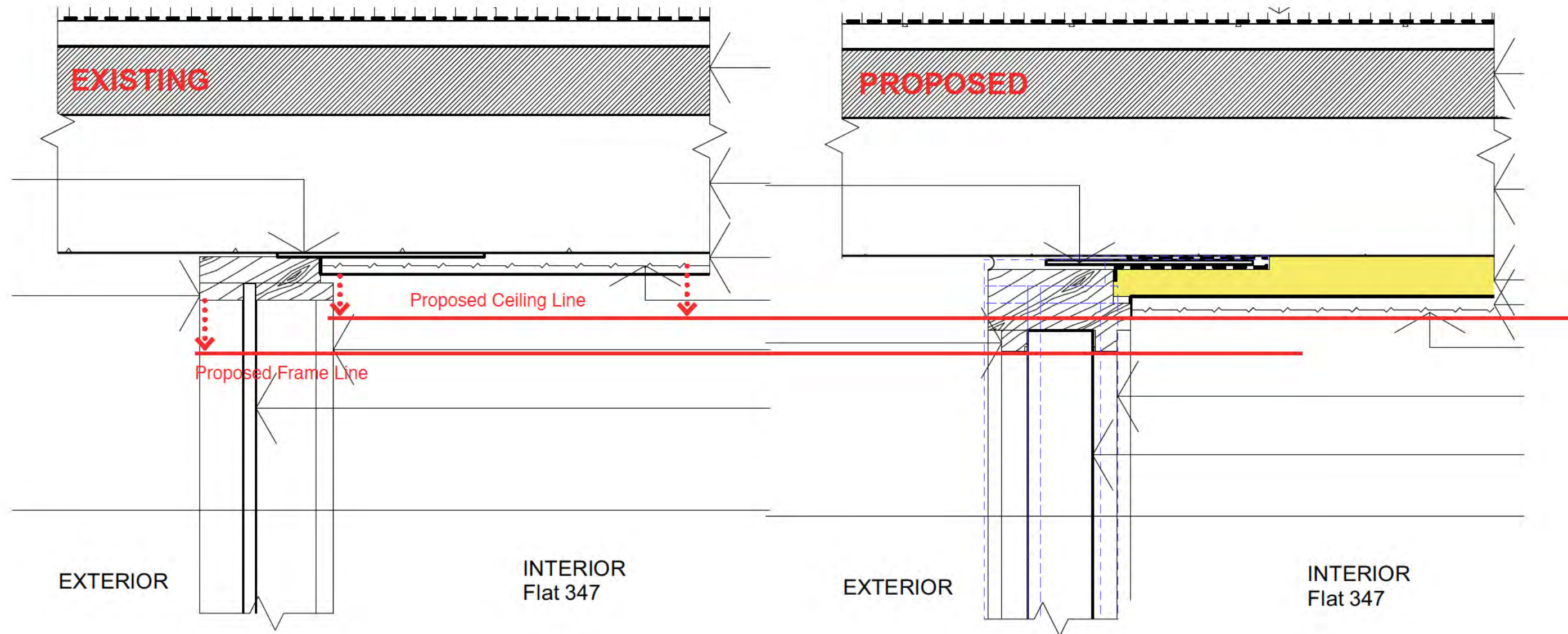
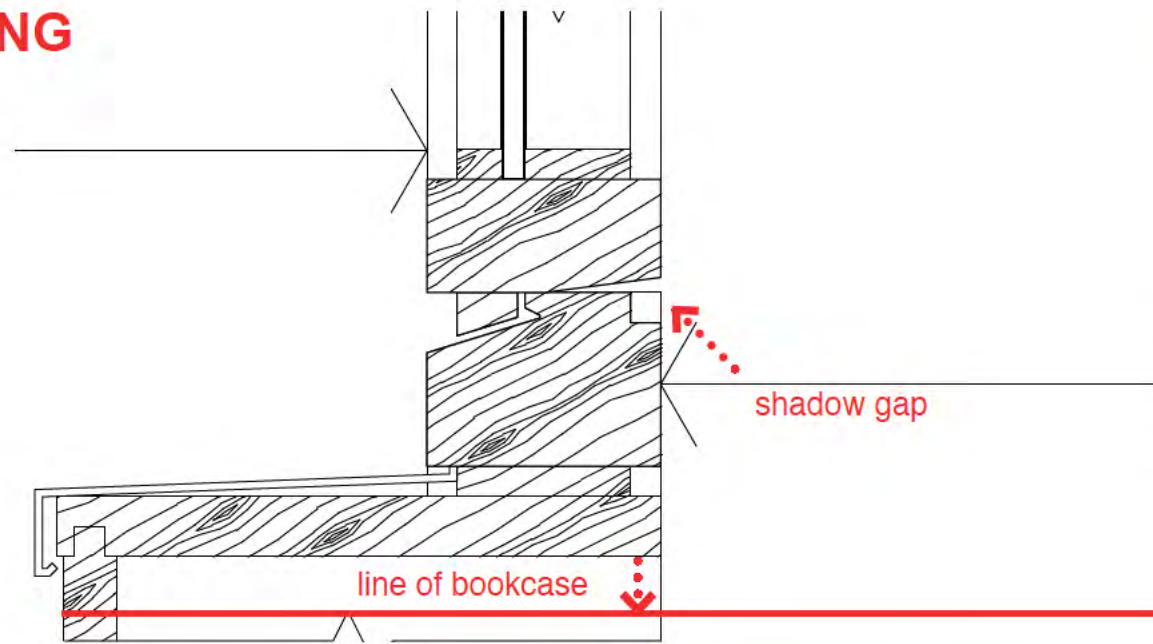


PHOTO OF EXISTING CONDITION



PHOTO SHOWING LOCATION



Indicative
3D image of
EXISTING
junction

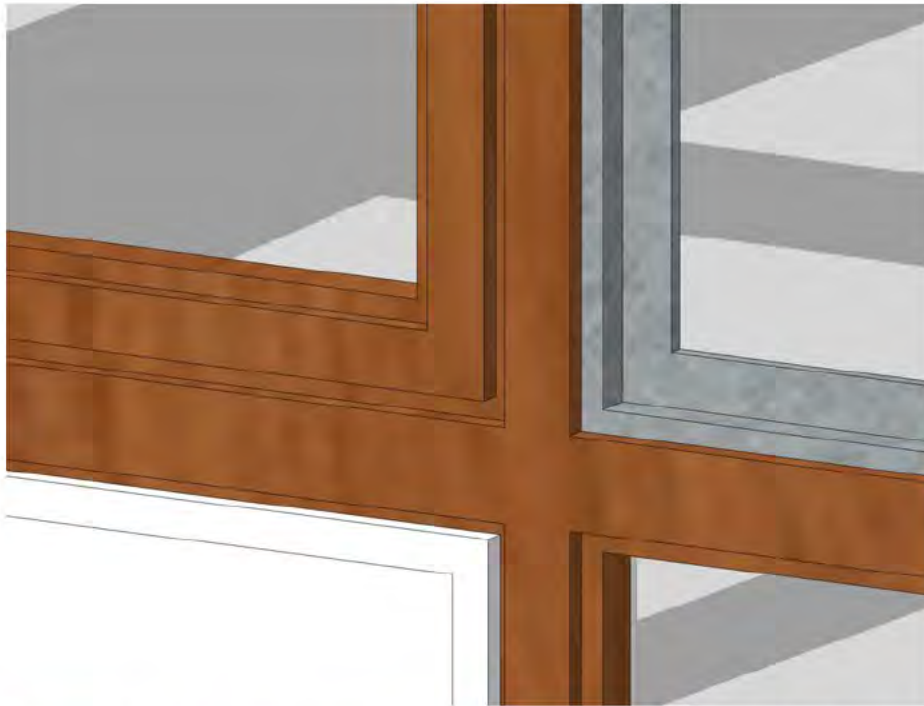
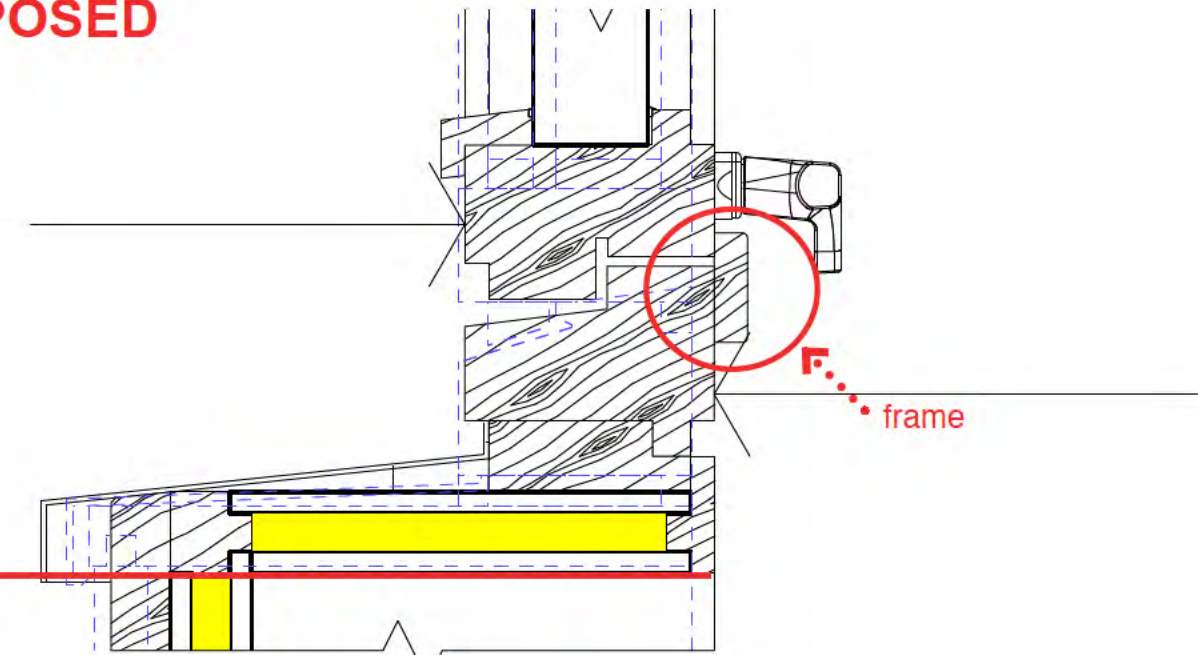


Photo
showing
EXISTING
junction



Indicative
3D image of
PROPOSED
junction

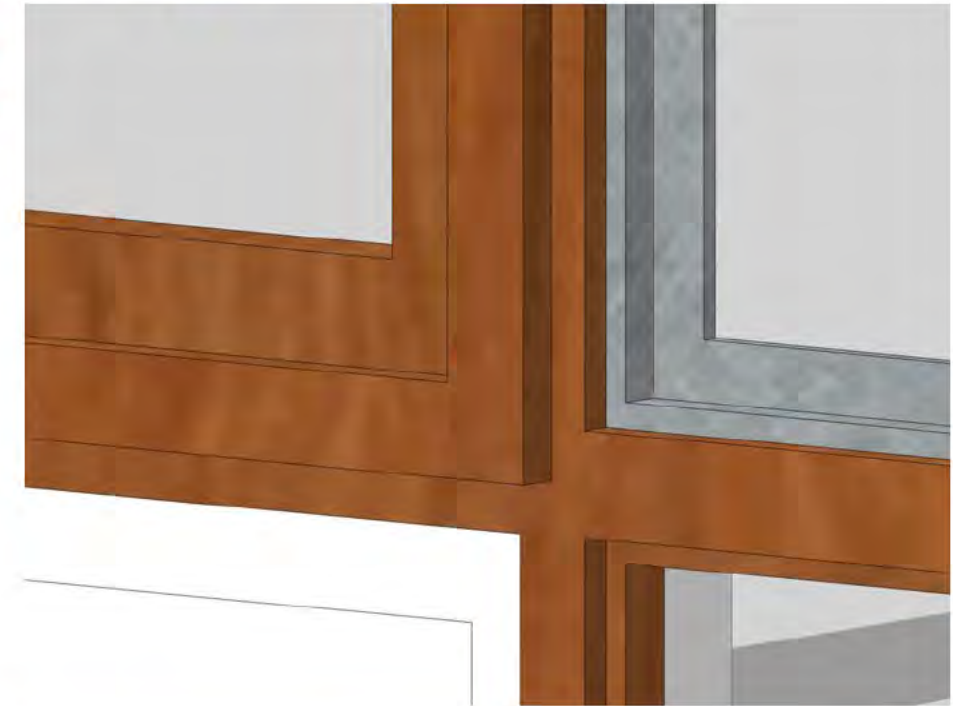
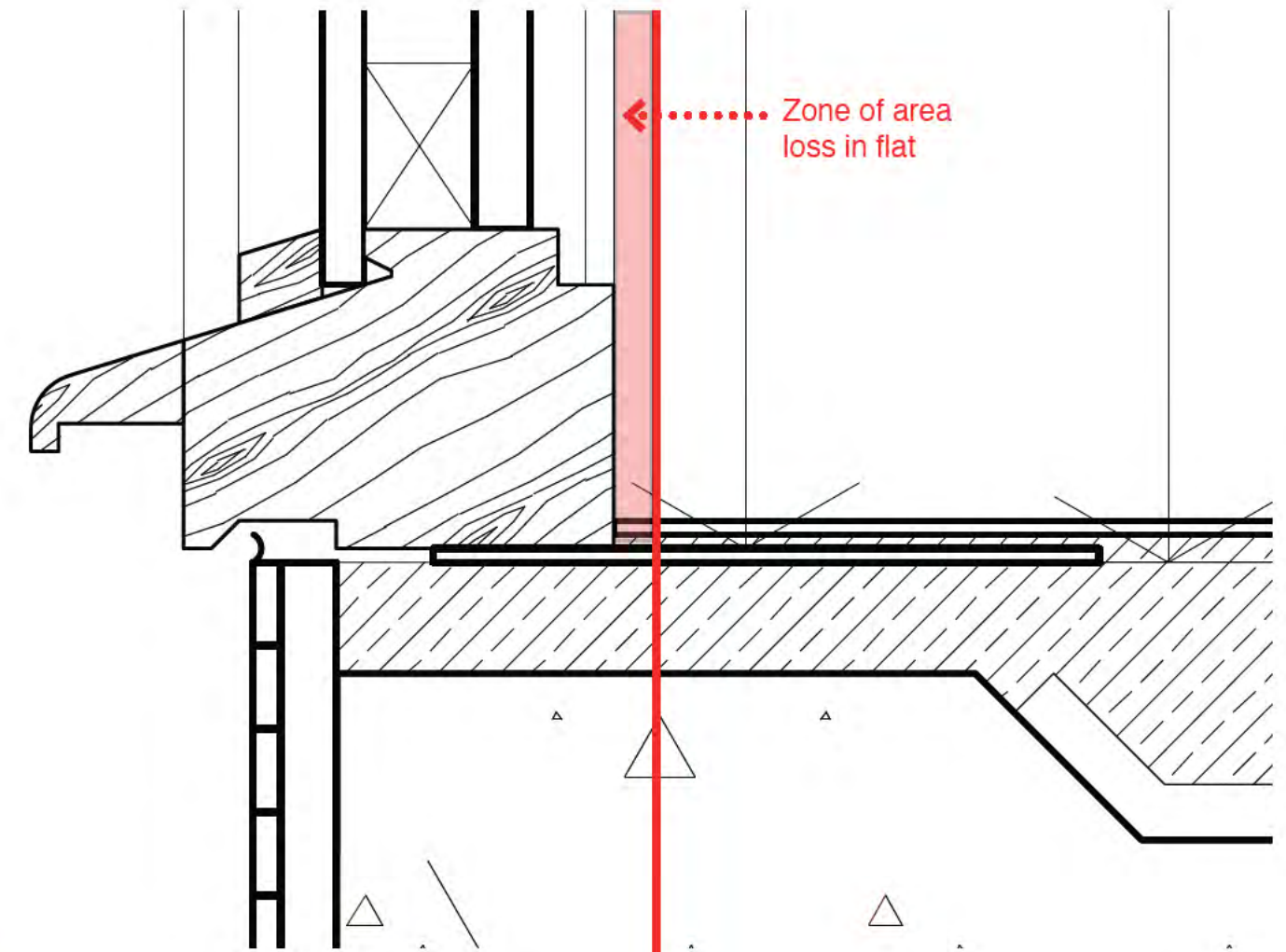


Photo
showing
location
(EXISTING)



03

EXISTING



PROPOSED

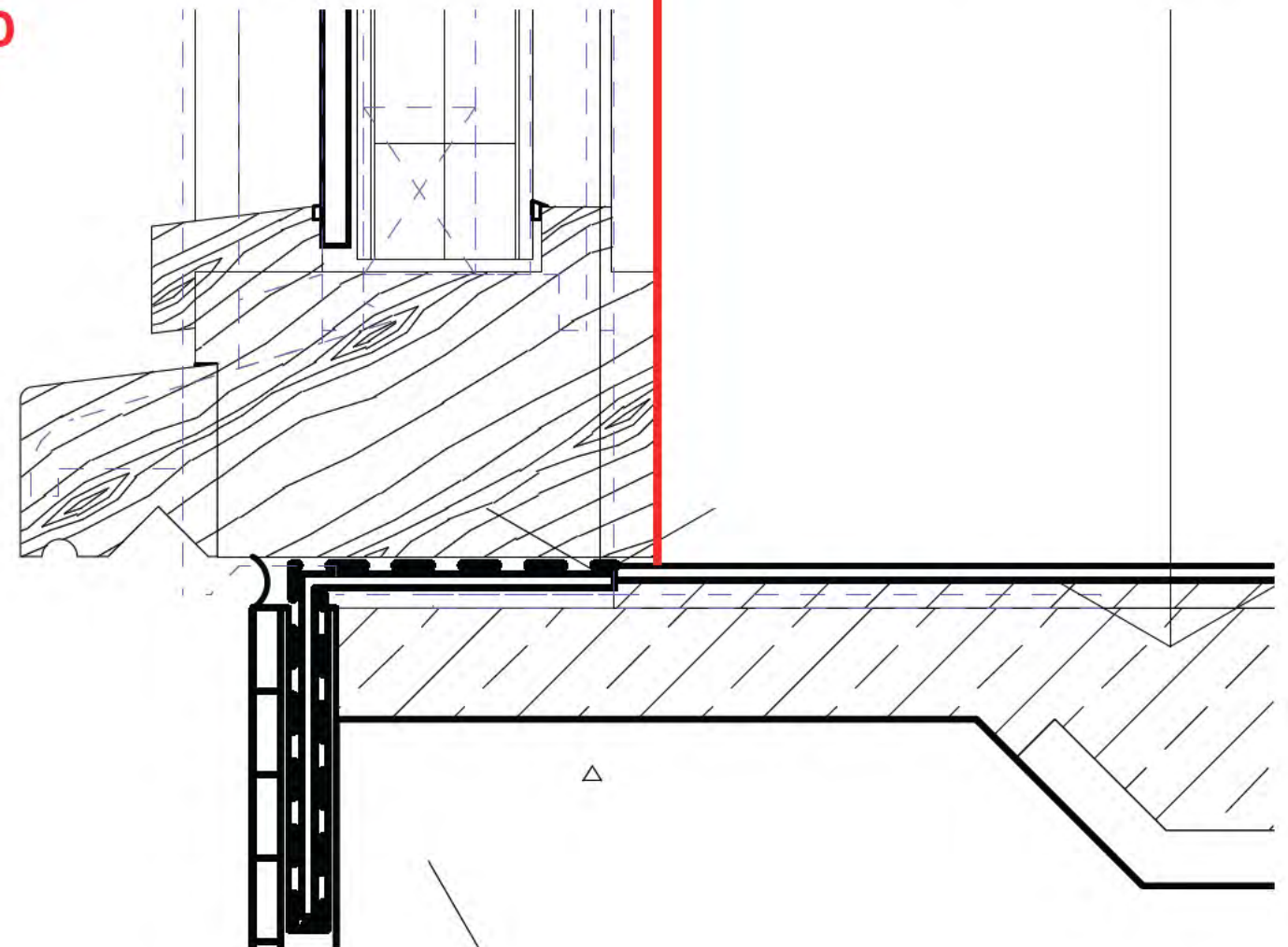


PHOTO SHOWING LOCATION

04

Refer to analysis of detail 01 for impact of deeper frame at curved soffit

Photo showing EXISTING kitchen windows

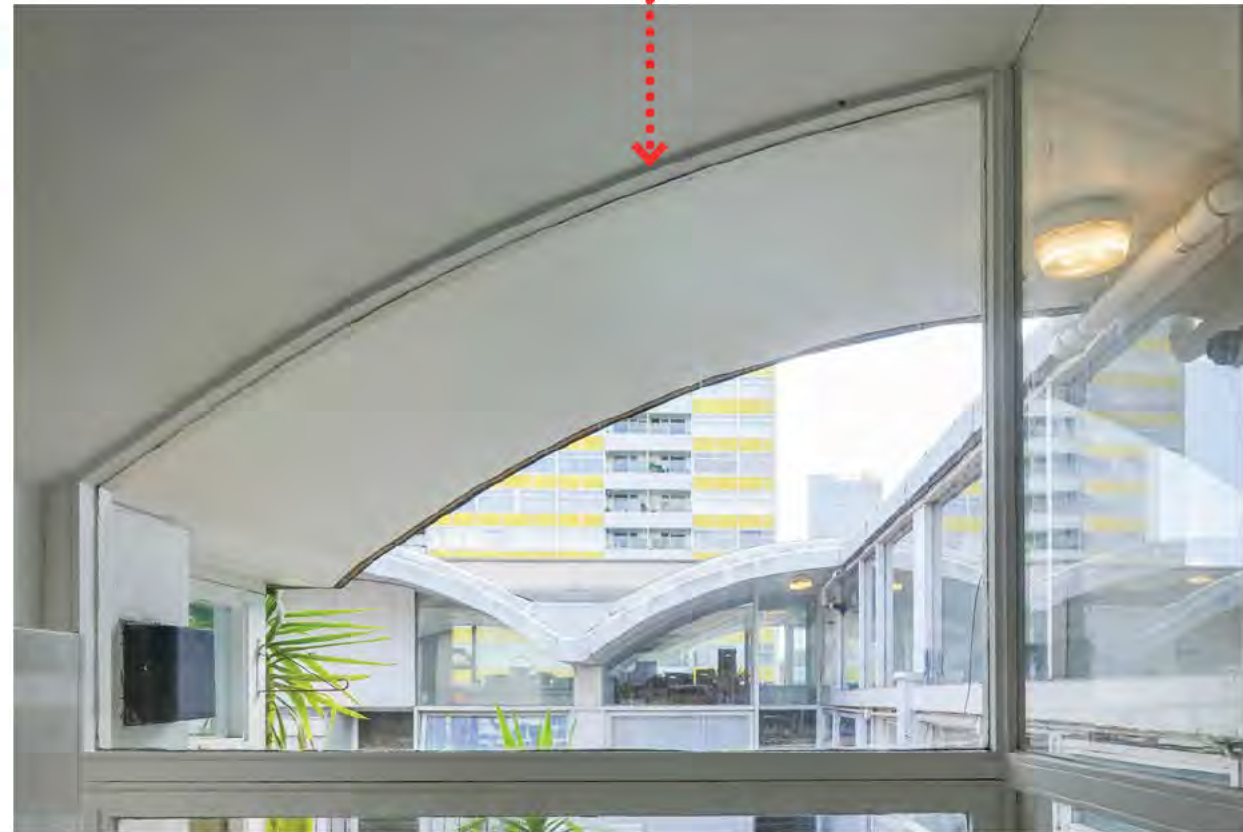
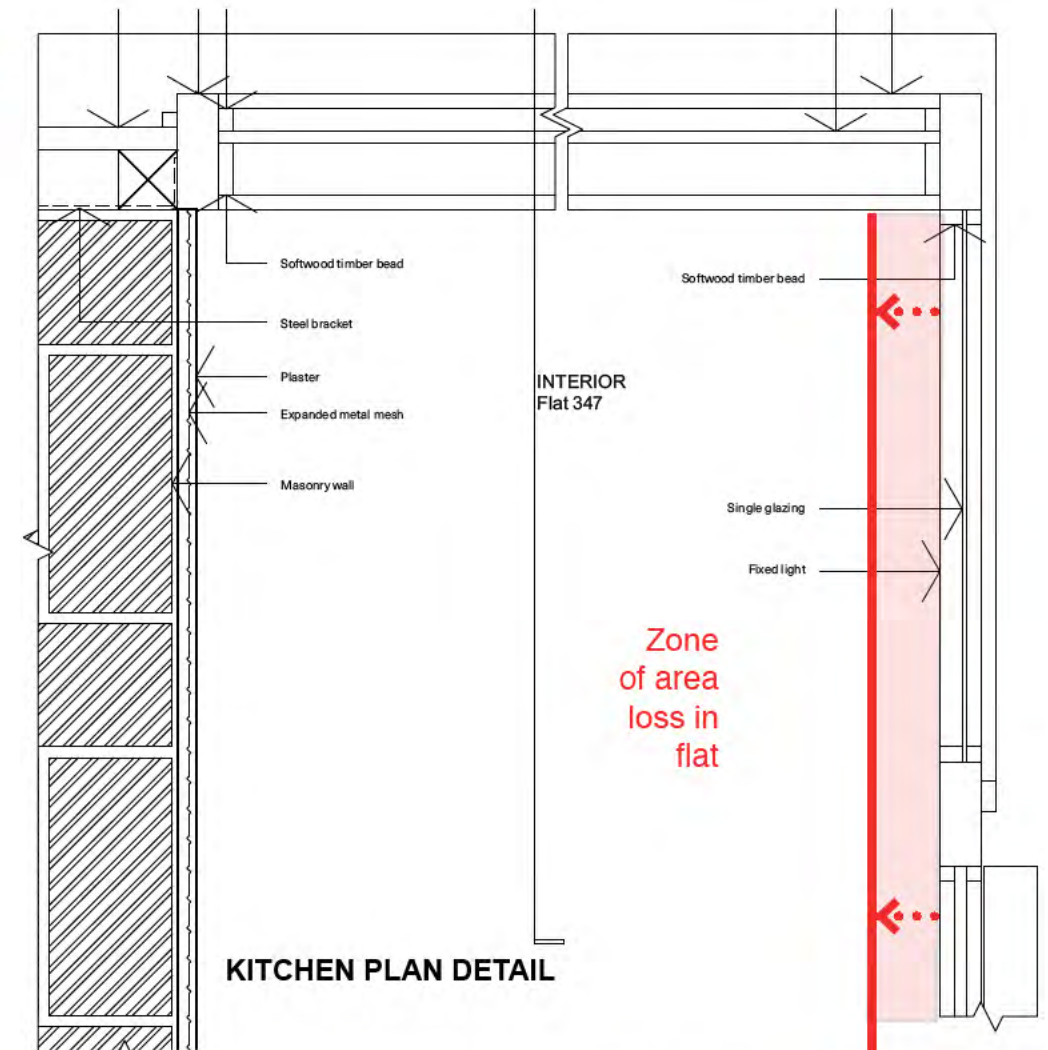


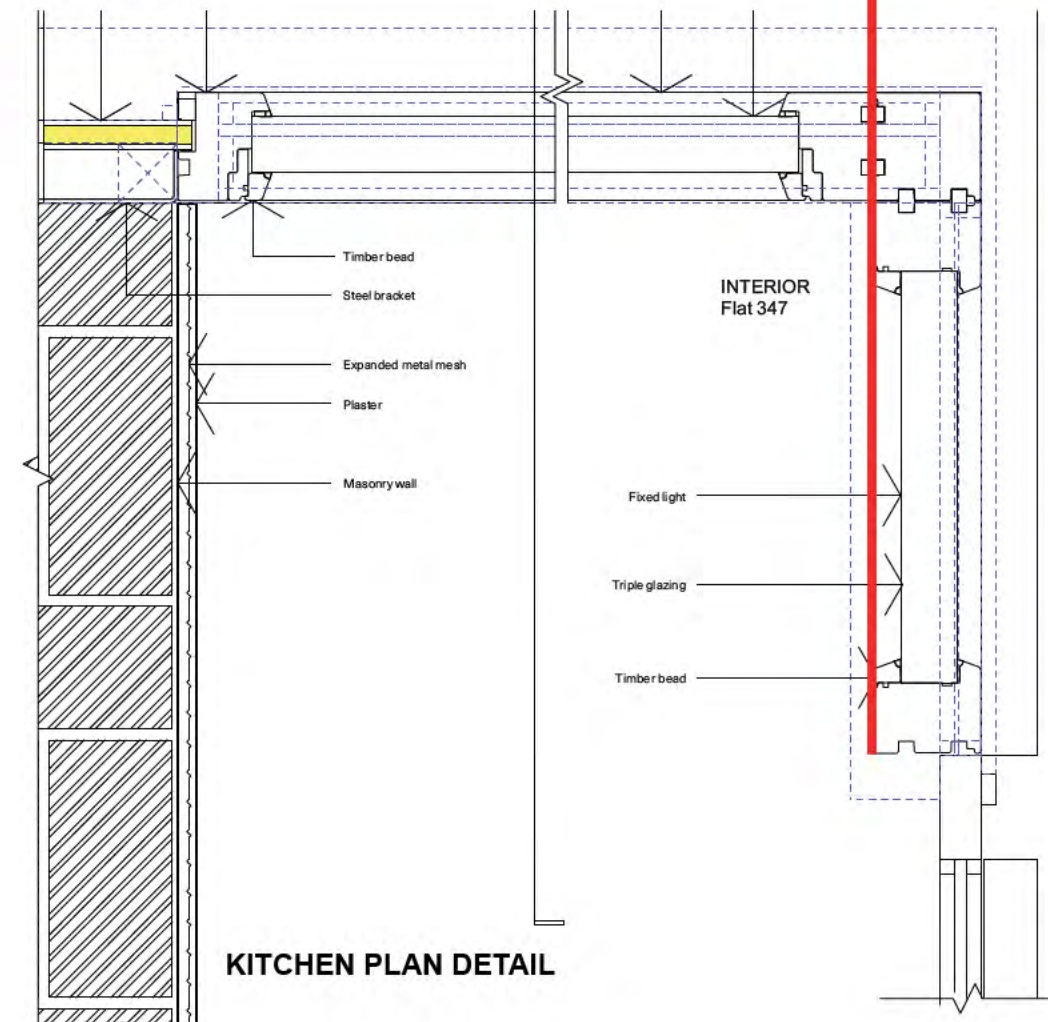
Photo showing EXISTING with indicative proposed window line



EXISTING



PROPOSED





EXAMPLE OF DOUBLE GLAZING IN EXISTING FRAME

Comments for Planning Application 22/00323/LBC

Application Summary

Application Number: 22/00323/LBC

Address: 347 Crescent House Golden Lane Estate London EC1Y 0SN

Proposal: Replacement of existing single-glazed windows to Flat 347 with triple glazed windows, together with installation of insulation to internal walls of flat (temporary consent for 5 years).

Case Officer: Amy Williams

Customer Details

Name: Mr Graham Kern

Address: 213 Crescent House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Put simply, this hasty attempt to rejuvenate Crescent House is visually illiterate.

In 1997, Historic England formally documented the sophisticated design of Crescent House and awarded its very rare, Grade II* listing.

Yet, for the past 25 years, the City has been dilatory in its obligated care and preservation of Crescent House - which is now 60 years old and blighted with fast advancing and unsanitary decay.

Historic England vigorously championed the Corbusier-inspired, design of Crescent House which, in turn, powerfully influenced the Barbican Estate, whilst also aligning Crescent House with the exalted architecture which animates the Square Mile.

Our cityscape is unique and magnificent: it spans 2,000 years from Roman settlements; via the English Baroque of Sir Christopher Wren; to the dazzling 'hi-tech' of Sir Norman Foster.

Why then is the City proposing to coarsely future-proof Crescent House with chunky-framed, triple glazing?

Against the highly considered listing, the City's proposal is unsuited for the densely glazed block, not least its stepped West façade.

Indeed, it is preposterous.

It is equal to bolting dozens of fluorescent-pink Chinese Pagodas over the dome of St. Paul's Cathedral in the deluded hope that it will look youthful.

Please, I implore the City to stop haemorrhaging funds for its dozy and spurious research, and to cease wasting further years of the Residents' precious lives.

Instead, the City must work swiftly with professional experts for, now, the situation is an emergency.

Urgently the City must liaise with, and eagerly defer to, experienced Heritage Architects who will swiftly guide, visualise and credibly scope affordable proposals to revive Crescent House.

The City's current proposal is ill-conceived and I object to it.

Comments for Planning Application 22/00323/LBC

Application Summary

Application Number: 22/00323/LBC

Address: 347 Crescent House Golden Lane Estate London EC1Y 0SN

Proposal: Replacement of existing single-glazed windows to Flat 347 with triple glazed windows, together with installation of insulation to internal walls of flat (temporary consent for 5 years).

Case Officer: Amy Williams

Customer Details

Name: Mr Pablo Abellan

Address: 307 Crescent house Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am writing to OBJECT to 22/00323/LBC

This application to remove the original 1962 hardwood windows as a explorative exercise seems to me without rational.

The heritage statement produced by studio partington explores reasons to destroy original detailing by invoking what they describe as "original design intent"

The design intent is what was built. Like describing the use of wire glass as a safety measure because otherwise the architect may have used clear glass if it had existed as safety glass at the time?

How would the corporation of London react if all the windows at Guildhall had their lead removed and replaced with single sheets of glass? Because the architect at the time may have used single panes if they where available?

Aesthetics are created from hundreds of decisions made in the design process. These cannot be replicated with intent or clear glass.

All details inform the reason why the rare grade 2* was awarded to crescent house.

Again I invite every member of the planning committee to visit my flat to see in detail the magic created by all those design decisions that where made by the architects 60 years ago.

We painstakingly sanded and oiled every single inch of the interior of these beautiful frames and the results are exactly what the architects intended. Joy. Eliminating the detailing will destroy any emotions brought by this craftsmanship to future generations.

I urge you to stop the application to remove the frames at 347 crescent house and replaced with lesser versions of what was created with so much attention and care.

The frames at 347 can too be lovingly restored and upgraded with invisible changes like vacuum double glazing.

I OBJECT to this application

Pablo Abellan

Comments for Planning Application 22/00323/LBC

Application Summary

Application Number: 22/00323/LBC

Address: 347 Crescent House Golden Lane Estate London EC1Y 0SN

Proposal: Replacement of existing single-glazed windows to Flat 347 with triple glazed windows, together with installation of insulation to internal walls of flat (temporary consent for 5 years).

Case Officer: Amy Williams

Customer Details

Name: Mr Neil Haas

Address: 106 Crescent House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I am objecting to the application for the following reasons-

1. Flats should be considered on a case by case basis and not be subject to a blanket proposal that is developed by an application approval arising from work carried out on one property only.

Complete removal of the existing frames is unnecessary and the success of the procedure in one flat is crucially limited in its suitability to provide a building wide roadmap for the window works program as around 85% of the flats have existing original frames that are suitable to be refurbished and are able to receive new glazing without being removed and destroyed.

Any ongoing application should as thoroughly investigate refurbishment possibilities to the same level as the current removal and replacement proposal.

2. Removal of windows and surrounding building fabric will have a devastating effect visually and in terms of the residents' wellbeing.

Crescent House is a Grade 2* listed building and is of international architectural significance. The viability of retro-fitting the existing units with triple or double glazing and refurbishing frames where possible should be thoroughly researched and an application developed for this.

Furthermore any vulnerable residents will be unable to cope with the disruption, mess, noise and destruction of the part or whole outside wall of their flats, especially since the City of London have

not provided any plan for how to house residents whilst the work is undertaken.

I know first hand of several neighbours in their 80s who will not be able to cope with or even face the thought of such disruptive works. The welfare of these residents should be considered on a personal level and the flats they live in on a case by case basis.

The current proposals do not consider these serious personal and social issues in any depth and this needs to be completely rectified in any further application.

Gavin Hutchison, 103 Crescent House, Golden Lane Estate, London, EC1Y 0SJ

PLNCOmments@cityoflondon.gov.uk

15th June 2022

Dear Madam / Sir,

Planning and Listed Building Consent Applications 22/00322/FULL and 22/00323/LBC

Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL

Planning Reference - PP-11143903

I wish to vigorously object to these application on the following grounds :-

Process Objections

The application itself is contrary to commitments made by the applicant's team during resident consultation; including at a Final Public Consultation Session 24.11.2, that a refurbishment approach would be drawn and costed before any planning application was made.

The application for a 5-year temporary consent for changes to a Grade II* listed building is not appropriate to the importance of the heritage asset. That the very visible changes to this building are not considered worthy of a permanent consent should be taken as evidence that the applicant is either not confident of their proposal or would like the consultees to consider the application with less weight. The idea that a dismantled façade is ever likely to re-constructed on the building is misleading.

Heritage Impact Objections

In terms of heritage impact, the proposals are (a) unjustified in the very "light touch" and insubstantial application documents; and (b) in any event harmful to the heritage significance of this important 20th century building. For the local planning authority to grant planning permission for these proposals would amount to a major departure from both planning legislation and planning policy. Accordingly, I object to the proposals on these grounds.

The protection of England's historic environment is delineated by a listing system which identifies 2% of our building stock with characteristics that deserve special care. Grade II* protection is unusual and applies to around 5% of this number. Very few of these were built in the 20th Century and only a handful are 'mass housing' which were often built quickly and cheaply. This is not what happened at Golden Lane where the City Corporation commissioned and built a '*total environment*' with a '*good claim to be the most successful of England's housing developments from the early 1950s*' Listing 1021941

Paragraph 199 of the NPPF provides that when a local planning authority is considering the impact of a development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Crescent House is the **only** building in the Barbican and Golden Lane Estate that Historic England has deemed worthy of a II* listing. Accordingly, it is a building that deserves an extremely high level of protection and whose conservation should carry very great weight in terms of the NPPF.

Furthermore, section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant planning permission for alteration of a listed building, special regard must be had to the desirability of preserving the building, its setting, or any features of special architectural or historic interest which it possesses.

There is therefore a very high bar indeed for the City Corporation as applicant (and as local planning authority) to justify the granting of planning permission and listed building consent for these proposals.

However, the application documents are woefully inadequate to justify such a major intervention in a Grade II* listed building. The heritage assessment in particular has been poorly considered and delivered :-

- The heritage case developed for the replacement of a complete Grade II* façade has not been produced by independent and properly qualified heritage consultants. Pre-application documents show consultancy work being undertaken by The Heritage Advisory, but their appointment has not concluded in a final report. One may ponder why they were not in a position to provide their professional assessment of this scheme.
- Studio Partington hold no heritage accreditations and are in effect 'self-marking' their own proposals whilst apparently lacking relevant expertise in designated buildings. As a result, their analysis is light, of low quality and inherently partial. It does not comply with Chapter 16 of the NPPF, the research on the original fabric, design and significance of Crescent House being cursory and lacking rigour and thoroughness. The systematic classification of changes measured against heritage significance is non-existent and the conclusions drawn have been jumped to with no reasoning basis. The document does not reflect process as would be expected of a developed heritage case and has clearly been written to justify a pre-ordained design.

I refer to the separately submitted independent report produced by Purcell, one of the UK's foremost architectural heritage specialists. The author of the report is their 20th Century Heritage Consultant, Jon Wright. The research, analysis and conclusions have been carried out in accordance with best practice and the NPPF. As you will see, the Purcell report concludes that:

- (a) the application documentation is inadequate to justify the proposals; and
- (b) the proposals would be harmful to the heritage significance of Crescent House. Purcell identify that the level of harm to Crescent House would be "substantial" (within the meaning of paragraph 201 of the NPPF)

Given that the proposals entail "substantial harm", it must be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh the harm. The application fails to do this. There are alternative solutions (ie enhanced double or vacuum glazing) which would achieve the same benefits of the proposals without causing harm to the listed fabric. Moreover, in the context of the statutory duty in section 66 of the LBA 1990, it is impossible to see how the loss of the original fabric can be acceptable.

The Purcell report was commissioned by a group of residents of Crescent House but is an independent report of a professionally qualified heritage consultant, who is expert in 20th century architecture. I adopt the findings of the report as part of my objection. Clearly the findings of the Purcell report must carry great weight in the decision of the local planning authority on this application. The more so, since this is an application that the City Corporation has made as applicant, so it will be absolutely essential that the decision of the local planning authority does not have any appearance of bias or "light touch".

The documentation fails to justify the proposals in other respects:-

- no exploratory works on site have been demonstrated to inform the drawings
- the drawings have been found to include dimensional and detail inaccuracies
- there are no dimensions on the detailed drawings
- the materials proposed are only generally specified where final specification is necessary
- drawings that overlay existing and proposed conditions are confusing to most viewers

The drawings are essentially diagrammatic and do not provide consultees with a reasonably illustrated case for the proper consideration of the application.

Environmental Design Objections

The designs for Crescent House have had a long gestation yet they are proposed for this one unit without the holistic approach recommended by all stakeholders. No Services Consultant has been present for the project – a serious omission.

Studio Partington's site observations and resident surveys have identified condensation as difficult to manage in flats, yet the application does not propose new ventilation or tackle the challenge of incorporating this within the Grade II* listed fabric. The applicant's sustainability consultant, Etude, have described this inclusion as necessary to avoid the significant condensation problems caused by improving the insulative value and airtightness of the flat. (Crescent House Planning Energy Strategy Rev E Page 13). As also committed to *'We will definitely need some form of mechanical extract ventilation as a minimum ... as upgrading the windows alone will certainly exacerbate the risk of condensation and mould'* Studio Partington, Final Public Consultation Session 24.11.21. As proposed, this project will cause progressive damage to the property.

Sustainability Objections

The proposals for this application and the wider project have been justified as a response to the City of London - Climate Action Strategy. The aims of this policy are highly laudable but as proposed this project will be contrary to its aims.

No calculations have been undertaken on the embodied energy of the existing and new facades to provide a basis for the carbon cost of construction and occupation of Crescent House.

The full replacement of the façade is argued as necessary to reduce heat loss to a level compatible with low-temperature heating solutions and triple glazing is provided as the only solution without factoring the carbon cost of the loss of the original material and the harvesting of new high quality tropical hardwood from West Africa. A refurbishment approach of retaining the existing frames and installing slimline vacuum glazing could deliver similar U-Values compatible with low-temperature heating and with relatively little embodied carbon outlay. The effective demolition of this façade is therefore contrary to best practice sustainable design.

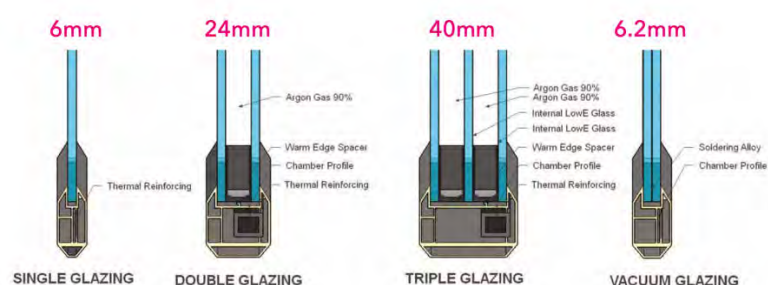
Specification Objections

This topic is critical as the supposed necessity for thick and heavy triple glazing is a key driver for the replacement of the façade, on the basis that the existing frames are not deemed strong enough to carry it.

The triple glazing proposal is an outdated specification for this type of project. Changing glazing from 6mm single plate to 40mm triple paned with the addition of a prominent spacer bar edge will significantly change the visual appearance of the building and cause harm [fig.1](#)



[fig.1](#)



[fig.2](#)

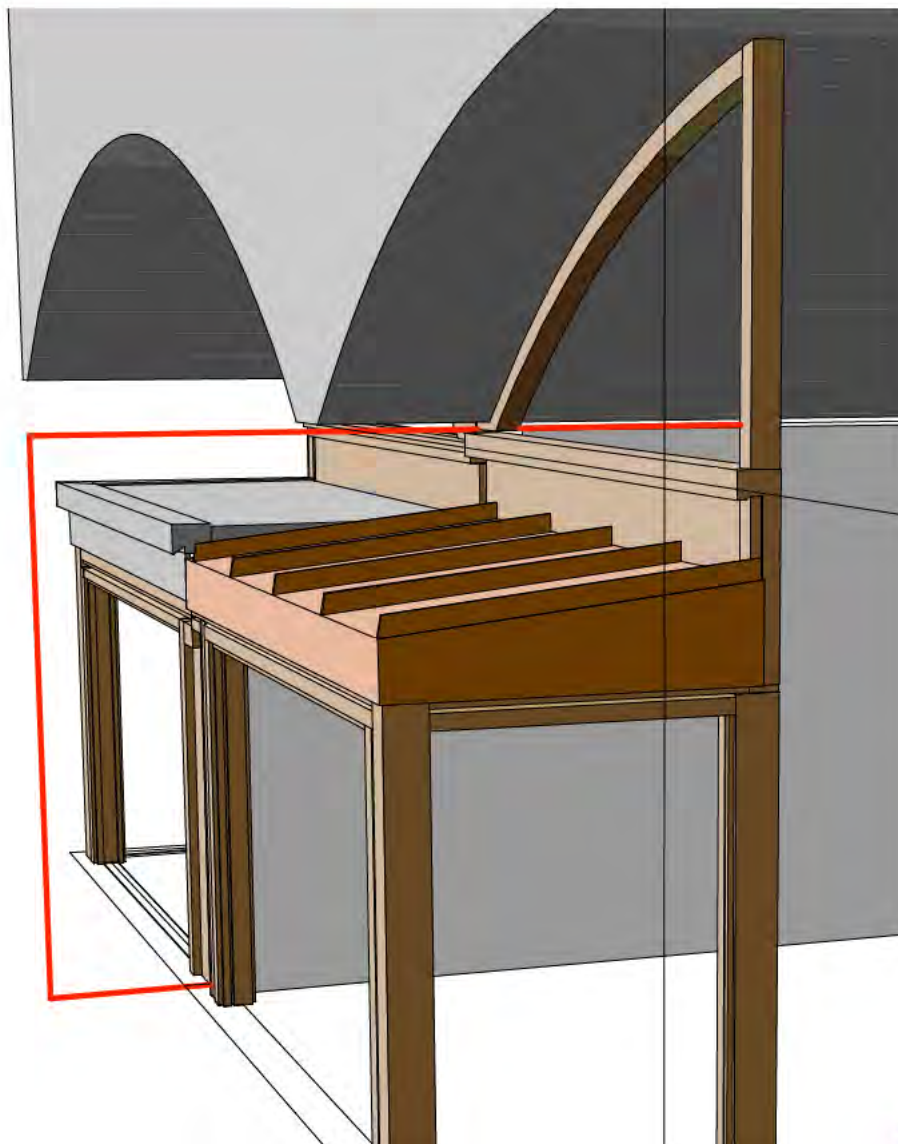
Heritage compliant, vacuum glazing panels, regularly used on historic buildings would be a 'like for like' replacement to the existing panes and match the weight, thermal and acoustic properties of triple glazing. [fig.2](#) This product has been specified extensively for all new windows on the high profile **Museum of London** refurbishment and has been reviewed and approved by the **City of London Planning Team**. The Project Team are aware of such products but have chosen not to provide a refurbishment option that utilises their benefits.

Visual Objections

The proposed façade arrangement does not match the existing even though a precise replica is perfectly possible with new hardwood frames incorporating modern glazing and high-performance insulation.

The removal of a checks and rebates and resultant increase of section sizes will increase the visual heaviness of the frame and destroy the carefully considered elegance and proportion of the original facades.

The roof of the bay window has been swapped from a standing seam metal roof to a parapet edged un-drained flat membrane with a completely different profile. It is difficult to justify such a significant change to the basic design of a listed building and If these exist side by side, they will be visually uncoordinated in proportion, section and colouration. If carried through on a future project the change to the original designs will be detrimental as the heavy roof edge will become more dominant. All issues would be harmful to the listed building [fig.3](#) (red line denotes boundary)



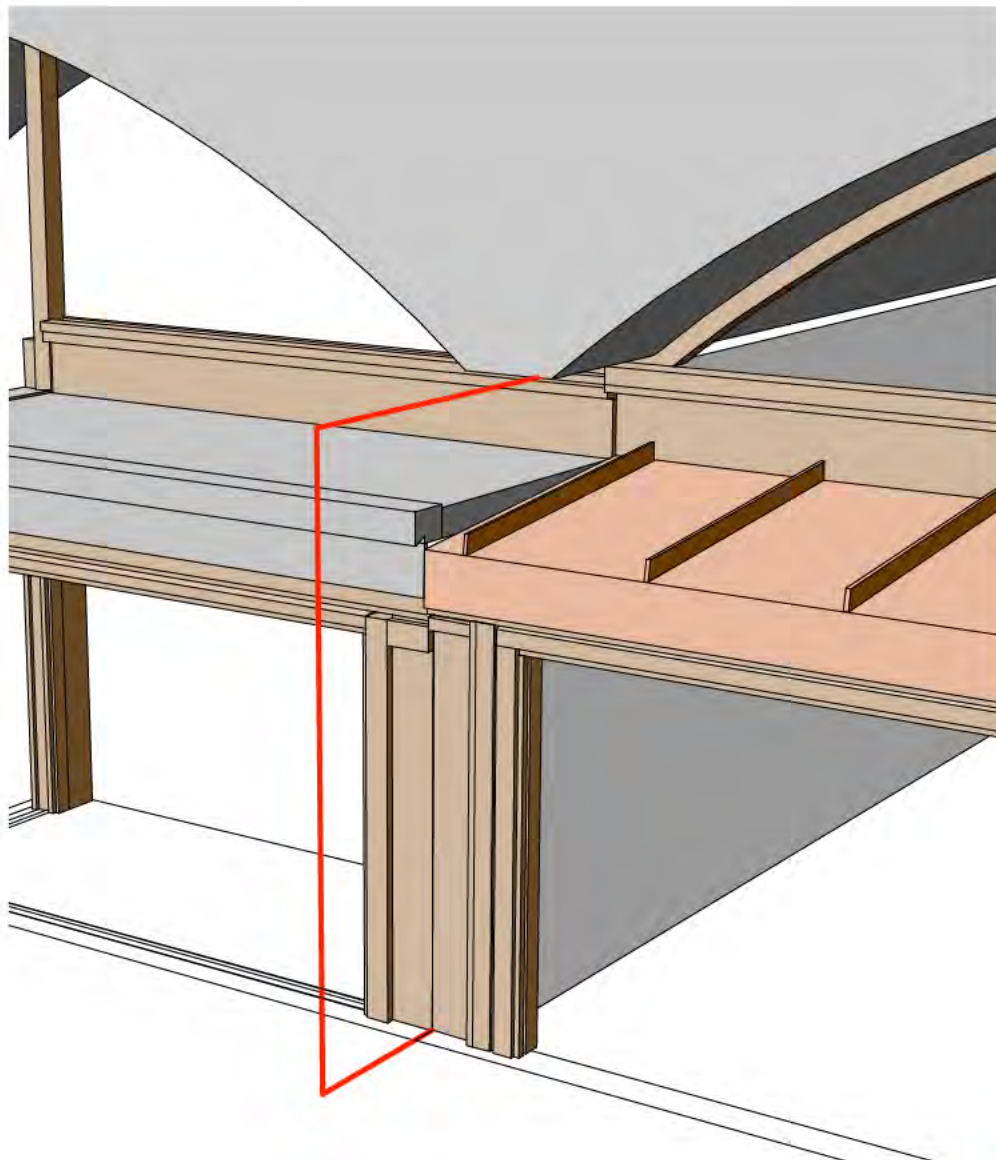
[fig.3](#)

The proposal to replace the existing offset centre pivot aluminium window with a side hung thick framed ersatz copy will cause substantial harm to the 'punctuation' of the elevations. This is a highly sophisticated and elegant feature which was specially fabricated for the project. This generic replacement will change the detailed proportions and when open will protrude from the façade much further than the existing. The proposal should have included fabricating a modified replica utilising high performance glass for this pilot to be credible.

Weathertightness Objections

The technical problems of detailing and weathering between the new and the existing fabric when these are a different shape have not been solved. It is not acceptable to note '*To be resolved when the fabrication drawings for the joinery are produced*' in an application for LBC. The reason applications expect complete detail is that such resolutions have visual impacts. The attached 3D views have been generated directly from the application drawings to demonstrate the above issue which can only be solved by unsightly flashings and would deface and endanger the building [fig.4](#) (red line denotes interface)

Note : it is instructive that the application documents do not include any 3D visual information illustrating the new designs in isolation, as a comparison or in context on the façade.



[fig.4](#)

Conclusion

The designs proposed for this property, and as a pilot for Grade II* Crescent House as a whole, are completely unjustified in terms of heritage impact. They have not been fully developed, are unsustainable, fail to resolve technical details, do not take advantage of new technology and ignore the visual impact on the rest of the building façade. Above all, they would cause irremediable harm to the heritage significance of the building which cannot possibly be justified in light of the fact that there are alternative means of improving the building's energy performance without wholesale replacement of its original façade.

The proposals in this 'pilot' project embody the strangest form of conservation practice, whereby the protected artefact is destroyed to understand how to preserve it. Replacing the entire façade of a Grade II* listed building without proven justification and with no realistic expectation that it would be re-instated would result in substantial harm to Crescent House.

Accordingly, I object in the strongest terms to the proposals and urge you to reject.

From: [Williams, Amy](#)
To: [Parker, Joanna](#); [Environment - PLN Support](#)
Subject: FW: OBJECTION Planning Application 22/00323/FULL & 22/00323/LBC Flat 347, Crescent House, Golden Lane Estate EC1Y 0SL
Date: 15 June 2022 13:21:42
Attachments: [image001.png](#)

From: Nigel Smith [REDACTED]
Sent: 15 June 2022 12:13
To: Williams, Amy <Amy.Williams@cityoflondon.gov.uk>
Subject: OBJECTION Planning Application 22/00323/FULL & 22/00323/LBC Flat 347, Crescent House, Golden Lane Estate EC1Y 0SL

THIS IS AN EXTERNAL EMAIL

Dear Amy Williams

Apologies for late Representation

I trust you can accommodate it

Planning Application 22/00323/FULL

Listed Building Consent Application 22/00323/LBC

Flat 347, Crescent House, Golden Lane estate, London EC1Y 0SL

I am writing to OBJECT to these applications for the following reasons

The applications are described as a 'pilot' for the future full-scale replacement of the windows and façades to approximately 150 occupied flats at this important grade II* listed building Crescent house at Grade II * listed is the most highly designated building located in The Conservation Area. Further, I am not aware of any other 20th-century grade II* listed building in the City of London

The application appears to propose the complete renewal of the windows and façades to both elevations of this particular singular flat as a 'pilot' study

I am at a loss as to what a 'temporary' planning consent for five years' actually effectively means?

In the circumstances does 'temporary' have any particular legal or statutory definition

It's confusing and incomprehensible. And misleading

Although the application make reference to 2 approaches namely

1.

The upgrading of the windows within the existing hardwood frames

2.

Alternatively, the complete renewal of the frames and façades in their entirety with triple glazing inserted

The application pays much greater attention to the latter and very scant attention to former Careful inspection to the details of this application and to the absence of addressing significant associated issues (outlined below) reinforces this apparently pre-existing prejudice

The Hallas Window Survey (2020) condition survey commissioned by the City recognises that 85% of the hardwood frames were capable of reuse with only 15% requiring repair . Although the application makes reference to this report it does not include its details within the application

This omission, seemingly, to give greater weight to the entire replacement of the façade elements

There are grave dangers in giving approval to this application if it is used as a 'pilot' to be replicated to a further approximately 150 units.

The curved and varying nature of Crescent House is of great sophistication and is one of the main reasons for it being listed Grade ii*

The number of individual and peculiar configurations which will be encountered in extrapolating the existing proposal in such a mechanistic fashion will be myriad and individually complex

Each one giving an opportunity for ad hoc and ill considered constructional junctions/details which cumulatively are very likely to completely destroy the original appearance of the façades

These elements being one of the main reasons for the original listing

The 20th Century Society (see their letter 9/6/22) and English Heritage's pre-application advice to the City dated 8 May 2019 (copy available if required) makes great play that a **complete**

holistic approach to any works to this building is **vital**

Regrettably the current application suggests otherwise

Further complications that will arise as to exercising any repairs and upgrading this Grade II* building will necessarily involve addressing the following additional issues - if anything like a holistic approach is to be achieved

Central heating flues

A very significant proportion of the 150 flats in this block have individual gas-fired boilers with flues penetrating the external envelope in a variety of fashions. The problems in accommodating such existing flue ways and any new flue-ways penetrating the external envelope both from a visual, practical and thermal insulative aspect require very careful consideration

There is no evidence in this application such matters have been considered

The main roof thermal capacity

The thermal capacity of the main roof is extremely poor and contributes to heat loss and condensation in the upper units.

No proposals to upgrade these areas is proposed

Cantilevered first floor structures

These have very limited thermal insulation and again give rise to high degrees of resident discomfort and occurrences of condensation and mould growth

No proposals to address these issues is proposed

The projecting bay structures

To the front elevation do require sensitive repair due to inherent design defects, defects to subsequent alterations, and many years of poor maintenance.

These elements present a most important contribution to the elegance of the western façade
Focused consideration to addressing constructional shortcomings to these important elements is not clearly addressed

The drawings accompanying this application

Are at such a small scale and give no appreciation of the visual differentiation the proposals would create to the main elevations

I cannot see how proper meaningful consideration to this application can be given without such drawings

Namely

There are no large-scale details indicating the size of the existing timber window sections and the proposed window sections - which would give an indication of the visual ramifications of increasing the dimensions of such elements

The application discounts the use of heritage consistent vacuum glazing which would deliver comparable U values and improved RW acoustic values and be capable of being accommodated in increased rebates to the original hardwood sections - without the visual disruption inherent replacing these framing elements with timbers of increased dimension

Without such consideration I cannot see how proper evaluation of this application can be given
Roland Jeffrey's letter of objection (the contents of which I wholly endorse) makes mention of several units on the block having been double glazed by having the existing hardwood sections rebated to accommodate thin vacuum double glazing.

He states how quickly this can be executed at how completely visibly unobtrusive such works are on completion

I completely concur. I have witnessed such works myself and further, have executed identical works to my own flat in the adjacent Golden Lane Estate block Basterfield House - without the necessity of scaffolding and executed in a couple of days

The applicants give no indication as having seriously considered this strategy

English Heritage in their pre-application advice to the city dated 8 May 2019 say

*Crescent House is one of the **jewels in the crown of the City of London's architectural legacy** and widely admired for its unique style and innovation.*

It illustrates in built form, the development of CPB's ideas which is highly significant given their key role in the evolution of post-war architecture in Britain. Its status as a grade II listed building reflects this.*

They further state

.... Given the specialist nature of this work, I do urge that you appoint a design team with appropriate skills and knowledge of post-war housing and if possible, the work of CPB.... (The original Architects Chamberlain Powell & Bon)

Despite representations to the City on this matter The City continued to progress to appoint Studio Partington a firm which admittedly has had some experience with historic buildings but is not an Historic Building Accredited Consultancy

I respectfully suggest that the nature of this application indicates serious shortcomings arising from the rather limited experience of this firm with buildings of this rare and particular nature

C20's letter of objection dated 9 June 202 (contents of which I wholly endorse) recommends the refusal of this application and promotes an alternative approach suggesting retaining the existing hardwood frames to the main part of the building (85% of which are free from significant defect) but with sensitive reconstruction of the projecting bays to the west elevation (which have

suffered from their exposed locations, some aspects of the original design, from poorly detailed repair works and years of non-maintenance)

C20 stress that the existing timber design sections window furniture etc to the bays should all be respected including the reuse of existing window fittings and the window cleaning pole element (including effective and unobtrusive rainwater discharge)

Rowland's letter of objection outlines the current defects/neglect to these projecting bays - to which I again concur

Architectural Importance

Both C20 and Mr. Jeffery's letter clearly and lucidly outline the high significance of this Grade II *listed building and comprehensively rehearse the Statutory Obligations inherent to protect such buildings in the event of any proposed works

In these circumstances I do not propose to reiterate these arguments (to which I wholeheartedly concur)

Save for the following

Great weight should be given to the conservation of the special interest of both designated heritage assets. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] 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 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification.

I would therefore request you revisit these texts and consider their implications and whether any (unfortunate) approval of this application would meet the City of London's Statutory responsibilities in this regard

For all the above reasons

I urge you therefore to REJECT this application

Nigel Smith
Chartered Surveyor & Chartered Architect
MSc Dip(Arch) FRICS RIBA
Late of 338 Crescent House
Now of 56 Basterfield House
Golden Lane Estate
London
EC1Y 0TR
Mobile: [REDACTED]
email: [REDACTED]

From: [Sarah Batty-Smith](#)
To: [PLN - Comments](#)
Cc: [Williams, Amy](#)
Subject: Planning Application 22/00322/FULL Listed Building Consent Application 22/00323/LBC Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL
Date: 16 June 2022 11:49:18
Attachments: [rich text with attachments \(RTFD\).rtfd](#)

THIS IS AN EXTERNAL EMAIL

I object to the planning applications and work you are planning to undertake under the above references for the reasons below.

1. A grade II* building is being vandalised to illustrate/prove a point. This will result in substantial harm. Surely not what the listed building committee foresaw when they granted listed building consent to Crescent House. Why is a sloping roof being replaced by a flat one?

Below is the listing description

2. The intention to re-instate the work after 5 years is really beyond comprehension as it will not be possible. And why 5 years, that seems an awful long time?

3. Besides the changes to 347 being vandalism, it will look totally odd from the outside. What sort of message does that convey to passers by?

4. A new window and facade could be mocked up. There should be a mock up of a triple glazing unit and facade and another with double glazing, the latter being the preference of residents and as has been advised to the City.

5. The application does not take into account ideas put forward by residents for a refurbishment, it prefers a wholesale rip out and replace as advocated for by the City and subsequent devaluation of an asset.

6. The energy used for replacement materials for a rip out and replace exercise has embodied energy implications.

7. Flat 347 is very different to mine, I am first floor east facing. Mine is one of the smallest flats in Crescent House so any reduction in floor space I vehemently oppose, for floor space read ceiling and wall too, a reduction in space will affect the price of the flat!! Additionally, as it's east facing it is easily warmed in the summer, in fact fairly unbearable so any glass should partially reflect the heat back, so make it bearable to live in.

8. There is no mention of the other necessary works that go hand in hand with the window/facade work. As I understand it, there is presently a non functioning ventilation system in Crescent House, certainly for the flats situated in the corridor that do not benefit from windows in the kitchen and bathroom. Additionally, no installation of insulation is mentioned for the soffit on the void area for the flats on the first floor. Both need to be included and the best they can be to bring Crescent House up to a good standard that people want to and are proud to live in.

9. This is a pilot project. But what thought and planning has there been about the upheaval and displacement of residents when the work is to be done this has never mentioned?

Thanks
Sarah Batty-Smith (Miss)

130 Crescent House
Golden Lane Estate
EC1Y 0SJ

Sent from my iPhone

From: [Polly Powell](#)
To: [PLN - Comments](#)
Cc: [Williams, Amy](#)
Subject: Planning Application 22/00322/FULL Listed Building Consent Application 22/00323/LBC Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL
Date: 16 June 2022 18:11:45

THIS IS AN EXTERNAL EMAIL

Dear Planning Committee,

> I have become aware of the planning application by the City of London Corporation to undertake a pilot project on flat 347 Crescent House for the replacement of existing single-glazed windows with triple glazed windows, together with installation of insulation to internal walls of the flat.

>

> I am the daughter of the architect Geoffrey Powell (of Chamberlin, Powell & Bon, the architects of both the Golden Lane Estate and the Barbican Estate). I am also the publisher of Stefi Orazi's recent book on the Golden Lane Estate. Consequently, I have considerable knowledge of the Estate.

> I object to this pilot scheme. The reason I am objecting is because the proposed changes do not adhere to the original build and materials, intrinsic to the original plans. The fact Crescent House is grade II* listed, and recognised as a national heritage asset, makes the proposals not just insensitive, but wrong. The proposals will cause substantial harm and will incur unnecessary expense and environmental harm.

>

> The original fixtures and fittings are an important feature of the Golden Lane Estate. Indeed, properties that retain their original fixtures and fittings are bought and sold at a premium. Repairing the existing windows (rather than replacement) is a more appropriate, sophisticated approach that will help retain the value that is placed on the Golden Lane Estate.

>

> I think it is very important that the voices of the residents are heard. Any decision on the current proposals should be ratified by the residents.

Yours sincerely,

Polly Powell
46 Wilmington Square
London WC1X0ET

From: [Dominique Tipper](#)
To: [PLN - Comments](#)
Subject: Objection to 22/00323/LBC
Date: 20 June 2022 00:09:57

THIS IS AN EXTERNAL EMAIL

I have owned a flat in Crescent House for four years and I lived there for two of them. I have a deep affection for the Golden Lane Estate and its remarkable historical relevance and I loved living there.

I have seen plans for the pilot flat to replace the windows and I am deeply concerned about the scale of disruption this would cause to residents that live there.

I am completely on board for the insulation, noise reduction and general state of the windows to be improved and brought up to date, but it seems the way you are planning to go about it is the least effective and desirable for not only the City but the residents/leaseholders.

Having scaffolding up around the whole building all at once poses a serious security issue, especially if the plan is to put the dividing wall up in the flats as seen at Great Arthur House.

When the concrete works were being done it was an absolute nightmare living in the building through those works with men walking about outside our windows on the scaffolding, shouting and doing the work with no consideration for the residents. There was no privacy and it was severely unpleasant. I found myself deeply distressed. This plan as it currently stands would be triple the disruption the concrete works caused and this would cause a serious detriment to residents' mental health on top of all the regular and obvious ways it would be disruptive.

Also from what I understand based on surveys conducted by the City and my own research is that not only are the windows able to be refurbished because most of the timber is in very good condition over being completely replaced, but that it is definitely the more desirable way to go when it comes to retaining the Grade 2* listed features which is one of the main reasons I purchased my property, and it is the more economical, and least disruptive way to go.

I really think all of these things need to be deeply considered and I'm not entirely sure they are based on the plans for the pilot flat.

I strongly object to them in their current state. I believe we can and must find a better, least disruptive option and one that seriously considers the wellbeing and mental health of the residents.

Dominique Tipper

Best Dominique

Crescent House

Planning Application 22/00323/FULL Listed Building Consent Application 22/00323/LBC
For Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SN

Application Report
Purcell Heritage Consultancy
June 2022



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- 2 Outline History of the Site
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I Instruction

Purcell have been instructed to assess and report on the above application by three residents of Crescent House, namely Gavin Hutchison of Flat 103, Roland Jeffery of Flat 209 and Gaby Robertshaw of Flat 204 Crescent House as an application that impacts the material fabric and significance of the listing building. The instruction is to focus specifically on planning heritage policy and practice with respect to the treatment of Heritage assets in planning policy and guidance.

It has been completed by Jon Wright a specialist heritage consultant with Purcell Architects who has expertise in the architectural history and conservation of listed twentieth century buildings and sites.

The report addresses 2 key aspects of the application

1. The suitability of the accompanying Heritage Statement that has been submitted
2. The compliance with international, national, regional and local planning guidance

This assessment begins by setting out the basic history of the site and the building and is then focused on an assessment of the submitting documentation and its compliance with the policy and guidance that gives the listed building its heritage protection within the planning system.

References to the 'application' in this report refer to City of London Planning Application 22/00323/FULL or City of London Listed Building Consent Application 22/00323/LBC for Flat 347, Crescent House, Golden Lane Estate, London EC1Y 0SL

I.1 Summary Finding

It is the finding of this report that the scheme proposed in the application is not proportionate to the significance of the listed building and that consequently, the justification for the changes proposed is neither sufficiently supported by the documentation provided or compliant with the policy framework that is in place to guide change at the site.

2 Outline History of the Site



Cripplegate and neighbourhood, from Civitas Londinum, c. 1560



The Golden Lane Estate area, with Grub Street bottom right and Pickax Street to the left, according to John Rocque's 1746 map of London.

The area on which the Golden Lane Estate now stands was historically known as Cripplegate, a name which the current electoral ward of the area retains. Originally the northern entrance to Londinium's Roman fort, it was one of six main gates - the others being Ludgate, Aldersgate, Newgate, Aldgate, Bishopsgate, with the fifteenth century addition of Moorgate - alongside lesser posterns and cut-throughs.

By the mid-1700s Cripplegate itself was demolished, and the formerly wealthy neighbourhood had declined. The most renowned thoroughfare in the area was Grub Street, which ran from Fore Street east of St Giles-without-Cripplegate (Cripplegate ward was bisected by the city walls, and was therefore both "within" and "without") and was indicative of the area: it was an impoverished lane which existed on the margins of London's literary and journalistic scene, set amidst the neighbourhood's doss-houses, brothels and coffeehouses.

Its close geographical proximity to both Moorfields and Bedlam hospitals linked the street to

prostitution and madness, and the name of the street itself became a pejorative term for bad writing. To the west of the area lay Pickax Street (now Goswell Road), its name is thought to derive from 'Pickt Hatch' - an area of brothels said to be in this part of London during the Elizabethan era. The interim blocks comprised with alleys, stables, and courts.



An historic photograph of the area of Cripplegate after WWII bombing, showing protruding isolated walls and rubble.



A view of the Milton Street area (facing south toward the Thames, with the Golden Lane area out of shot to the centre/bottom of the photo) from the air, showing the extensive bomb damage and clearance (photo 1953).

Victorian period to 1950s

In 1829 Grub Street was renamed Milton Street, apparently in memory of a tradesman who owned the building lease of the street, in order to raise the profile of the area. The influx of business that followed saw a loss of residents, a process which was accelerated by the Farringdon-Moorgate underground railway extension in 1865.

The late Victorian commercial warehouses that occupied the majority of the area were devastated by extensive bombing during the Second World War, with contemporaneous

photography showing it reduced to vast swathes of rubble.

In February 1951 the City Corporation acquired the site, extending its original planned site to Goswell Road (where Crescent House now stands) in May 1954 with the compulsory purchase of a further 4.7 acres, resulting in a total area of nearly 7 acres.

3 Golden Lane Estate - Its Inspiration and its Impact on Post-War developments

The competition for designs to regenerate the area was announced in 1951, with the City Corporation's brief outlining proposals for 940 one, two, three or four room flats at the maximum possible density of 200 residents to the acre, with a central heating and hot water system, a basement storage area in each block, and a community centre. The partnership of Chamberlin, Powell and Bon was formed when on 26 February 1952 Geoffrey Powell was announced as competition winner and subsequently formed a partnership with two other lecturers in architecture from the Kingston School of Art - the three having entered into an agreement that if any of their separate entries won the competition, they would share the commission as a team.

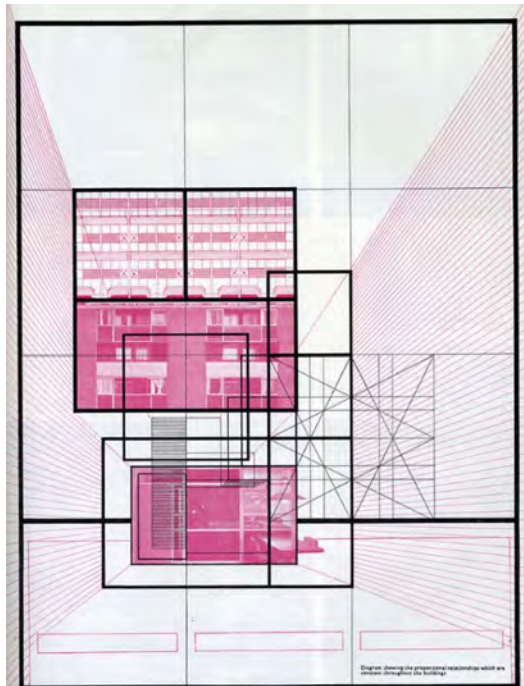


Diagram produced by Chamberlin, Powell and Bon showing the proportional relationships which are constant throughout the buildings on the Golden Lane Estate including those at Crescent House

Chamberlin, Powell and Bon stated in the Architect's Journal in 1953 that they "attempted to make Golden Lane truly urban as, for instance, Florence or Oxford City are truly urban", eschewing the Garden City Tradition, their design championed the "strong contrast between true town and true country", using the heights of buildings to house restaurants and pubs "like a lot of stork nests [with] views of the Thames, or railway termini."

Their scheme consisted of an 11-storey tower and 12 lower-level blocks and a community centre, all set around a series of pedestrian courts, designed to function as an urban microcosm.

With the requisition of additional land adjoining Goswell Road in 1954, the by-then already altered design of the estate continued to evolve, with a large number of flats being concentrated into the landmark tower-block (increasing from 11 to 16 storeys), and the utilisation of deep basements of destroyed buildings, with the further provision of shops, tennis courts and a swimming pool, a pub, and further blocks of housing.

The estate as a whole was influenced by pre-war architecture and planning schemes of Le Corbusier, with its conceptual recreation of a city in miniature, "stork nests", open plan stairs, and double height stair spaces. Crescent House, however, has an affinity with the Post-War work of Le Corbusier, perhaps principally Maison Jaoul at Neuilly-sur-Seine. The building owes much of its aesthetic identity to Maison Jaoul which placed the planar surfaces and geometric façade composition and frank materiality; but other projects such as Maison Lannemazan (1940) Maison Perissac, Algeria (1942) were possibly influential. Chamberlin Powell and Bon followed the output of Le Corbusier closely and in great detail and the partners organised office trips to visit the works.

Designed by Le Corbusier for the industrialist André Jaoul and built in 1954-6, Maisons Jaoul are a celebrated pair of houses in the Paris suburb of Neuilly-sur-Seine. The houses are considered among his most important post-war buildings, as well as his earliest brutalist works. They feature a rugged aesthetic of *béton brut* and rough brick, notably employing great concrete lintels as horizontal bearers, distributing the weight of the vault over the irregular openings.

Crescent House borrows heavily from Le Corbusier, including the use of a proportional measuring system in a mixed-use, modernist, and residential high-rise. Whilst at a very different scale to Maisons Jaoul, Crescent House directly references the heavy arched concrete lintels and rugged heavy timber windows and in-fill panels, instilling the structure with a sense of monumentality, and marking it out as a unique example of the move towards New Brutalism.



Corbusier's Maisons Jaoul at Neuilly-sur-Seine



4 Heritage Context

4.1 Listed Buildings

Crescent House is part of the Golden Lane Estate and pre-dates the nearby Barbican in its aesthetic and materiality. The estate is part of a larger group of listed structures which contribute to an area with a very high proportion of heritage assets a full list is given here for context -

Grade I *Church of St Giles*

Grade II* *Crescent House*

Grade II *Barbican Estate, Dorothy Annan Murals on Speed Highwalk, Great Arthur House, Cuthbert Harrowing House, Cullum Welch House, Bowater House, Golden Lane Community Centre, Bayer House, Stanley Cohen House, Basterfield House, Golden Lane Leisure Centre, Hatfield House, Sir Ralph Perrin Centre*

Designated Landscapes

Barbican Estate (Grade II) Golden Lane Estate (Grade II)*

Scheduled Ancient Monuments *London Wall: section of Roman and medieval wall and bastions, West and North of Monkwell Square*

Crescent House is the only Grade II* listed building on either the Golden Lane or the Barbican Estate. Designated in 1997, its listing included the ground floor parade of shops and a public house. The list description is extensive and includes detailed expression of the role the façade plays in the historic and aesthetic values of the building as well as underlining its value to the wider context of British Post-War architecture.

*"The massing of the curved and arched cornice, with the sill and pilotis below, and the stepped profile of the dark and largely glazed floors of flats in between is exceptionally impressive. Hardwood timber windows stained dark, with pivoting centrally-hung casements and some aluminium side opening lights." ***

** The list description is inaccurate here as these side windows are actually on a central pivot.

"It is Grade I I for its place in the evolution of post war architecture and for the sophistication with which the contrasting materials and geometry of the facade are handled."*

The nearby Barbican Estate is also Grade II listed in its entirety, making it one of the largest heritage assets in Europe. The landscaping here is listed at the higher Grade II*, indicating its high quality of design as a formal landscape and its international value as a public space with private gardens.

4.2 Conservation Area

In April 2017 the Barbican Association and Golden Lane Estates Residents' Association approached the City with proposals for a new conservation area to include both estates. The City of London responded by designating the boundary in 2018 and producing an area SPD that was completed in November 2020. The boundary shown on the accompanying map covers both estates and is designed to give supplementary planning advice.

The document contains the following important clause that is concerned with potential change to the buildings on both estates, offering informed commentary on the survival of character and highlight repair and maintenance as a key aspect of the conservation effort to preserve and enhance that character.



Barbican and Golden Lane Conservation Area Boundary Map.

Potential Enhancements

The post-war, modernist character of the Estate has survived well. Small-scale enhancements to urban greening, lighting and wayfinding could all help to enhance the Estate yet further, alongside ongoing projects of repair and maintenance of the fabric. Additionally, the reversal of later alterations could be beneficial where this would better reveal and enhance the original architectural character of the Estate.

5 Assessment of Statement of Significance & Heritage Statement

Overview

It is the view of this report that neither of the supporting documents for this application are sufficient to properly assess the proposals. The high-grade of the listed building and the richness and complexity of the heritage context in which it sits require proportionate response in terms of both assessment and justification. In line with the policy and guidance for a heritage asset of this grade and in this context, the supporting documentation should give a full descriptive account of the building, a complete architectural and design history and a section of contextual or comparative analysis. The heritage statement takes information from a document that remains in draft form and in which the full significance of the building is not presented.

5.1 Statement of Significance

The Heritage Advisory Statement of Significance, Ref 2020/5364, was produced in April 2020 and remains in draft form. It is not clear why this work was not completed. It concentrates on the significance of the windows across the estate and draws some conclusions about their comparative value, placing Crescent House at the top of a hierarchical list of the buildings that make up the estate. The relevant paragraphs in the Heritage Statement that relate to significance are taken from this document and so it follows that the conclusions presented in it provide the only baseline information on which the justification for the changes are based.

Whilst the report sets out clearly the methodology set out in Advice Note 12, it follows it only cursorily and there are considerable gaps in the body of evidence that underpins the conclusions. We will address each of the points from Advice Note 12 as given on page 9 & 10 of the Statement of Significance, in turn. The clauses of the guidance are given below in bold, with the commentary in italics below.

Deciding how to analyse heritage significance is likely to depend on the kind of heritage asset concerned, the nature of the proposal and the level of understanding of its history and significance at the time of application, though it is worth bearing in mind that all these approaches may be needed in especially complex cases:

In considering the complexity of the Golden Lane Estate, its richness in terms of designation and the high significance of both it and the Barbican, the level of assessment should be of the highest standard. Only through a robust statement of significance; one that describes in detail the heritage asset and sets out its full history, can firm comparative conclusions about heritage value be reached. Having set out this significance, that then becomes the basis for a conservation-led approach to managing change. Crescent House is a complex case in this regard and therefore all approaches outlined in the guidance are required for the establishment of a proportionate baseline. The Statement remains unfinished and yet its conclusions have been used to define the significance of the building.

The context for any analysis of the significance of a heritage asset will be a thorough familiarity with the asset itself, developed through site visits, and appropriate inspection of the fabric, its features, materials and ornament, and also its setting if needed.

There is no evidence presented in the Statement of Significance that a site visit was undertaken or that any of the built fabric of Crescent House was visually inspected. There is no description section within the document that addresses the aesthetic value of the building as it is now. This makes it extremely difficult to factor historic development, later changes, material degradation or survival into the discussion about heritage value. This constitutes a major oversight in the Statement and means that it relies solely on historic assessment of the manner in which the buildings were constructed.

As is stated in the guidance document, a proper and full assessment of the fabric must be undertaken for the LPA to be able to make an informed judgement on the impact of any given scheme on the significance of the heritage asset as stated in Section 5.

It therefore follows from the NPPF requirement that an understanding of significance must stem from the interest(s) of the heritage asset, whether archaeological, architectural, artistic or historic, or a combination of these; and that this understanding:

**must describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal;
should be sufficient, though no more, for an understanding of the impact of the proposal on the significance, both positive and negative; and**

sufficient for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.

Taking these in turn, it is evident that the Statement of Significance has only partially addressed the site for its relative heritage values and that these values have not been fully expressed or placed in their proper contexts. Conclusions about heritage value are presented in general terms without appreciable analysis or a proportionate evidence base.

This lack of evidence for the assessment is manifest throughout the document where a series of anecdotal, rather than primary or secondary sources are used as support. The lack of sources is one of the main reasons for this as the document relies almost solely on the Management Guidelines and one secondary source from 1773.

Crescent House and indeed the Golden Lane Estate were extensively published in architectural journals at the time of construction and have been the subject of extensive scholarly attention and discussion ever since. The competition itself for the block was a watershed moment for British Post-War architectural development and the completed buildings have long been at the centre of any debate over the challenges and issues facing Post-War heritage. Whilst it would be acknowledged that it would not be proportionate to survey all literature relating to the estate and the building, the document presents none of these sources at all.

For heritage assets of this importance, that have been the subject of so much critical attention for so long, it appears a rather major oversight not to have addressed some of this material to support views of the relative values inherent in the design, fabric, plan form, visual identity and cultural value of the architecture.

As a result, it cannot be said the LPA are therefore in the position to be able to complete a judgement on the impact of this application, without a proportionate statement to underpin the decision. For an application to legitimately say it has been conservation-led or heritage-led, it must have addressed significance as part of the application for consent. This aspect of the guidance is set out in the document in Section 6, which sets out the requirements for a staged approach.

A staged approach to decision-making in applications affecting heritage assets

In practice developing applications for heritage-related consents will usually mean following a staged approach to decision-making. The development of proposals for change to heritage assets, and the consideration of subsequent applications based on the resultant proposals, benefits from a structured approach to the assembly and analysis of relevant information. A staged approach would usually embrace the following stages, informed by the scope of the proposal:

1. Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits

2. Understand the significance of the asset(s) These two stages fulfil the requirement in paragraph 189 of the NPPF and are undertaken by the applicant.

There is, in the Statement of Significance that underpins the Heritage Statement, no evidence that this approach has been followed. There is a brief assessment of the form, materials and history of the estate, but it is far from proportionate to the Grade II status of the building. For it to be so, a full account of the built history, a full description of the site as it now is and a detailed historic development and planning history should be evident. These would have then informed a detailed significance assessment section with relative significance judgements for the various elements, spaces and settings of the building. It is therefore not evident that this elementary, 2-staged approach that links historic research to informed judgement on value has been adhered to. Consequently, the report fails to understand the significance of the building and its context in line with the requirements of the NPPF.*

5.2 Heritage Statement

The Heritage Statement for the application comes in 2 parts. That which is included in the Design Statement and a Supplementary Note that was written as an addendum to what is written in the Heritage Statement.

What is written in the Heritage Statement falls substantially short of what would be expected in support of an application such as this; especially one which proposes the loss of a considerable amount of historic fabric of a Grade II*. The assessment of the building given is presented here for ease of reference

" 5.1 Heritage Crescent House is listed at Grade II* "

Whilst it might be expected that any heritage information would be contained in an accompanying Heritage Statement, this is cursory at best and in no way sets out the value of the asset.

Studio Partington also prepared, to go alongside this reference, an addendum which was designed to **"supplement the heritage information in the Design Statement"**

This document is more considered and gives salient historic points copied from both the HE List Description and the Management Guidelines but as with the Statement of Significance, the level of assessment is not commensurate with the high grade of the listed building and therefore offers only that which is given elsewhere about the significance of the building and its façade.

These elements are then followed by a Heritage Impact Assessment that the windows of Crescent House are of high significance but that significance is based on **'architectural and aesthetic values, rather than archaeological or historic'**.

Since there is no thorough assessment that cites and makes value judgements about this in any of the submitted or supporting material, it is impossible to qualify this assessment or be convinced by it. It would appear that the primary heritage argument for change based on significance, rests on the notion that the concept of the façade is of higher value than its materiality. This is an assessment that is neither expressed in policy or planning guidance and it has no basis in conservation theory or practice for any listed building - regardless of date.

The heritage assessment information given to justify the changes is neither comprehensive enough in its scholarship or specific and systematic enough about its judgements and it not evidence of a thorough understanding of the architecture or the wide range of heritage values it contains in its built fabric.



At Crescent House, many flats are set round open courts.

5.3 Compliance with Management Guidelines

The Design Statement references a section of the Management Guidelines as a justification for the change. The section is copied here for reference

"Whilst remaining original elements are always of interest for their authenticity and should be retained wherever possible, it may be noted that the 'special interest' of these interior fit-out arrangements inheres primarily in the ingenuity of their detailed design and quality of care as distinct from the actual materials from which they are constructed."

This text is taken from Section 2.3.5.3 Unit interiors. This section specifically addresses the interior fittings and fixtures of the flats on the estate and is therefore not relevant to any justification for changes to the façade or its components.

It is noteworthy that no further assessment of the Guidelines is given. However, the guidelines are clear on the importance of Crescent House façade and these are replicated here for ease of reference. Section 4.16 states clearly that -

Crescent House, the final building to be constructed, marks a departure from the earlier curtain wall blocks of the 1950's. It is a more robust, expressed structure and its shape responds to the gently curving line of the street, hence its name. The architects were particularly influenced by the work of Le Corbusier and referred to his Maisons Jaoul in developing their design. The ideas explored in the design of this building were significant in the ensuing character of the Barbican Estate, reflecting the importance of Crescent House in the development of the architects' design concepts. The list description for the building states: It is listed Grade II* for its place in the evolution of post war architecture and for the sophistication with which the contrasting materials and geometry of the façade are handled

2.3.5 Crescent House was the final building to be completed - in 1962 - and is a defining element of the estate's special architectural interest.

Historic England in the list description, amplify the value of the façade and the contribution it makes to the high grade of the listing.

"It is listed grade II* for its place in the evolution of post war architecture and for the sophistication with which the contrasting materials and geometry of the façade are handled"

On the matter of material change to the facades of Crescent House (and the other facades of Golden Lane's individually listed heritage assets), the management guidelines define a 'traffic-light' test, designed to guide change and give assuredness to decision makers, residents and stakeholders. There is a Black category and these works require LBC but a recommendation is given that these are unlikely to be given consent.

Black: Proposals for which an LBC application would be required, but where consent is unlikely to be granted

Any permanent changes to original existing facing material: timber, glass, concrete, mosaic, brick and blockwork

Given the importance of the original material, colours and textures in the architectural character of the estate and within the curtilage of Crescent House, it is highly unlikely that consent would be granted to make any permanent changes to the original material.

6 Policy

The framework of policy that controls and governs change on the Golden Lane Estate and Crescent House more specifically is substantial in heritage terms. This section outlines that policy and gives commentary beneath pertaining to the compliance with the relevant clauses, of the current application. As with the previous section, the relevant clauses are presented in bold with commentary beneath in italics

6.1 National Planning Legislation Planning (Listed Buildings & Conservation Areas) Act 1990

The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990. Section 66(1) reads: "***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 maybe, 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***".

The application proposes demolition of two facades at flat 347 of Crescent House to demonstrate and display a scheme that could be rolled out across the façade. The application does not present options for the preservation of the impacted fabric and so the test for the 'desirability to preserve' is not met. The supporting documentation expresses the special architectural interest of the façade and yet proposes the loss of it as being justified as part of a test. This is not a convincing or sound conservation approach and does not pay proportional regard to the value of the material fabric of the heritage asset in line with its significance.



6.2 National Planning Policy Framework (NPPF)

The revised *National Planning Policy Framework* (NPPF) was published in July 2021, replacing the previously published July 2018 version and 2012 Frameworks. With regard to the historic environment, the over-arching aim of the policy remains in line with the philosophy of the 2012 framework, namely that **"our historic environments..... can better be cherished if their spirit of place thrives, rather than withers."**

The relevant policy is outlined within chapter 16, 'Conserving and Enhancing the Historic Environment'.

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. There is no evidence base from which to properly assess the proposals and as they stand, they do not represent a correlative conservation response to the highly-graded heritage asset. Loss of all fabric with no methodology for replacement or making good is anathema to the conservation strategy that should be employed on a building of this importance.

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.

There is no evidence presented as part of the application that a strategy for the conservation of the façade has been fully explored. The facades of Crescent House make a considerable contribution to the overall significance of the building, the Golden Lane Estate and the conservation area that includes the Golden Lane Estate and the Barbican. Crescent House is deserving of a more thorough and open-handed conservation strategy that is led and supported by conservation-accredited professionals and robust supporting documentation. This application is not consistent with that approach and posits loosely that the value inherent in the facades is not the fabric, but the innovation and concept. This is a fundamental misreading of how the fabric relates to value and this has resulted in a scheme that is neither conservation-led or an enhancement of the asset.

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 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.

The significance of Crescent House has not been adequately expressed as part of this application. Selective quotations from a draft assessment that itself was not backed with any description, site visit or conclusive ratings on the comparative significance of the façade elements present as inadequate supporting material from which to assess the application. The level of detail for a Grade II* listed asset is substantially higher.

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.

Although the significance has been acknowledged it has only been cursorily explored and expressed in this application and it has not been reinforced by a robust and thorough heritage assessment of the listed building. It is not therefore possible to fully address the notion of conflict between the conservation of the façade and the proposals.

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.**

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.

This is the primary clause in the NPPF for the consideration of the scheme as regards its impact on the listed building and the conservation area in which it stands. The proposed development seeks temporary planning consent for 5 years - but involves destruction of two of the facades of a flat in a Grade II*. This total loss of historic fabric constitutes **substantial harm** to the heritage asset.

In proposing the extensive loss of fabric for the purposes of testing the approach that may be implemented across the rest of the building's facades, this application is not conservation-led and parallel options for retention, repair in situ and learning from previously articulated solutions elsewhere in the building have not been identified. This proposal does not in any way suggest that 'great weight' has therefore been given to the asset's conservation.

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**

Crescent House is an exceptional listed building. Any Post-War listed building has to exceed a high bar for listing at any grade and II* buildings from the period are understandably rare. This application, for the reasons stated have not set forth convincing justification for these damaging works. The scheme to remove fabric that contributes to the high significance of the listed building constitutes substantial

harm in NPPF terms and the justifications given are a considerable distance from being wholly exceptional. To have made a case for removal, the application would in NPPF terms, require the applicant to have produced strong supporting assessment and a conservation-led strategy for the scheme. This could have been in the form of an appraisal methodology for assessing the relative success of the new façade details with full-scale mock-ups so that comparative judgements could have been made that did not require the substantial harm to the listed building that is proposed. It is good practice with works to listed buildings where demolition is proposed, that full scale mock-ups of critical elements are trialled where there is a change of design or materiality.

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.**

This scheme proposes the loss of the entire façade fabric of one Grade II* listed flat and sets a dangerous and unsupported precedent for the future of the rest of the facades on both sides of the listed building. The facades on both sides are different and both require a bespoke and considered conservation response that has at its core the protection or enhancement of the significance of the building. There is no demonstrable public benefit advanced as part of these proposals and therefore on the basis that the losses represent substantial harm to the listed building, should be refused.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

This clause of the NPPF is of fundamental importance in the consideration of this application precisely because no reasonable steps can be taken to ensure the development will proceed and no methodology for making good after demolition has been submitted either. No LPA should accept the loss of fabric of a Grade II* listed building without these kinds of assurances.

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.

The significance assessment submitted is not sufficient for the heritage asset. The document is incomplete and selective in its assessment of the various criteria. It provides no relative assessment of features, setting nor any contextual understanding about the building.

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.

The scheme proposes the loss of important Grade II* fabric. Fabric that has a pivotal role to the architectural and design history of both the estates covered by the conservation area designation. The setting of Golden Lane and the Barbican would be negatively impacted by these proposals.

6.3 Planning Practice Guidance (PPG) (2019)

This section sets out other guidance that is relevant to the consideration of the proposals which has not been addressed for the reasons given in the previous section

The Planning Practice Guidance (PPG) was originally published in March 2014 although it has been subsequently updated over time. The 'Conserving and Enhancing the Historic Environment' section of this guidance was last updated on 23 July 2019. In respect of heritage decision-making, the NPPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted. In particular, the NPPG notes the following in relation to the evaluation of harm: "In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest." This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a "high test".

o Conservation Principles, Policies and Guidance (2008). This document sets out key guiding aims for the management of the historic environment and sets out a methodology for assessing heritage significance

Historic England Advice Note 2 'Making Changes to Heritage Assets' (February 2016) This document provides advice in relation to aspects of addition and alteration to heritage assets: "The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting" (paragraph 41).

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

This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the 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, neglect and unauthorised works, marketing and design and distinctiveness" (para 1). Paragraph 52 discusses 'Opportunities to enhance assets, their settings and local distinctiveness' that encourages development: "Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation".

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

This document presents guidance 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. Page 2, states that "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."

Approaches to the Conservation of 20th Century Cultural Heritage ICOMOS Madrid-New Delhi Document (2017) Authored by an international committee, this document provides useful, high-level guidance for the conservation of Twentieth Century Heritage sites and provides an international standard that addresses the sometimes particular approaches required for historic buildings and sites of the recent past. There are a number of relevant clauses in the document and the complete document is attached as an appendix. Some key clauses are given here:

1.2: Identify and assess the significance of individual buildings, groups of structures and cultural and historic urban landscapes. To understand the heritage of the twentieth century it is important to identify and assess all its elements, groups of related or connected places or associated cultural and historic urban landscapes, including the interrelationships between people, the environment and the site or place that contribute to its significance.

1.3: Identify and assess the significance of interiors, fittings, associated furniture and art works, collections, equipment and industrial machinery. To understand significance, it is also necessary to identify and assess interiors, fittings and associated furniture, art works, collections, and equipment and machinery associated with industrial sites and cultural landscapes.

1.4: Recognise and respect structural innovation, forms, construction techniques and building materials. The twentieth century was characterised by the introduction of innovative forms, structural solutions, building materials and construction techniques and these should be identified and their significance assessed.

1.5: Identify and assess the importance of setting. To understand the contribution of context to the significance of a heritage place or site, its setting should be identified and assessed. Setting includes not only the physical/tangible environment, but also the relationships and interaction (such as visual, ecological, historic, spatial) between the place or site and its setting. Heritage places may be part of a complex system where the relationships extend beyond the boundaries of individual sites or places.

2.6: Plan for maintenance and ongoing management. It is important to plan for regular preventive care and maintenance in the ongoing management of all cultural-heritage places and sites. Continual and appropriate maintenance and periodic inspection are consistently the best conservation action for any heritage place or site and reduce long-term repair costs. A maintenance plan will assist this process. Cultural and historic urban landscapes will require management plans to manage the processes of continual evolution and change to sustain significance. Emergency stabilisation work may also be required and assessment and subsequent work should be carried out by appropriately qualified and experienced professionals and implemented in a way that minimises impact on significance.

6.1: Adopt a cautious approach to change. Do only as much as much as is necessary and as little as possible. Any intervention should be cautious. The extent and depth of change should be minimised. Use only proven methods of repair and avoid treatments that may cause damage to historic fabric, and cultural significance; repairs should be undertaken using the least invasive means possible. Changes should be as reversible as possible. Discrete interventions can be introduced that improve the performance and functionality of a site or place on condition that its cultural significance is not adversely impacted. When change of use is under consideration, care must be taken to find an appropriate reuse that conserves the cultural significance.

6.5 Golden Lane Estate Listed Building Management Guidelines

In 2007 Listed Building Management Guidelines were prepared to help residents, those managing the estate and planning officers to assess what kind of work will need listed building consent. The Guidelines were formally adopted as Supplementary Planning Document (SPD) and therefore have statutory force. In 2013 a formal review was conducted and an updated version was adopted, reflecting changes in legislation and filling in gaps in the Guidelines that had become apparent since it had been published. Crescent House is described in the document as forming the 'defining elements of the estate's special architectural interest' and 'an important indicator of the evolution of post-war architecture, and design and construction of the late 1950s and early 1960s'.

The document was produced by Avanti Architects, a practice with expert knowledge of conservation of significant 20th century architecture. The document sets out the full history of the estate and gives 'traffic-light' recommendations for the management of change, grouping together works that can be done without Listed Building Consent and those that require it. As stated on page 16 of this document, the Guidelines have a traffic light system to manage change. Destruction of the façade of any kind not only requires Listed Building Consent but is unlikely to receive it.

6.6 Local Plan Policy

The following Regional and local plan policies are of relevance in assessing this application and are given for reference only.

London Plan (2021)

Policy HCI - Heritage Conservation and Growth
Policy HC3 - Strategic and Local Views

City of London Local Plan (2015)

Core Strategic Policy CS12: Historic Environment
Policy DM 12.1 Managing Change affecting all heritage assets and spaces
Policy DM 12.2 Development in Conservation Areas
Policy DM 12.3 Listed Buildings
Policy DM 12.4 Ancient Monuments and Archaeology
Policy DM 12.5 Historic Parks and Gardens

7 Heritage Impact Assessment

The application is for temporary planning consent for 5 years - but involves destruction of two of the facades of a flat in a Grade II* listed building which is also the most highly designated asset in the Conservation Area - a conservation area that covers two of the most important and influential Post-War housing developments ever built in the UK. It is therefore proportionate and consistent with good conservation practice and policy, that a considered and conservation-led strategy for any works is forthcoming where any change is proposed.

Flat 347 is presented by the applicant as a test case for comparison with the existing fabric of other flats that will remain intact. As the original fabric will not be replaced on the expiry of the consent it is questionable that this represents a temporary consent. The applicant declares that the works covered by this application are part of an analysis and development of options for the repair of Crescent House and an upgrade of thermal performance. Whilst investigative works and on-site and off-site testing would be considered part of the raising of options, it is far from conservation best-practice to demolish complete historic facades with a view to testing their ability in performance terms against the surviving fabric of a listed building.

The elements of the façade impacted by the proposals include a sequence of elements that are of high significance value to the heritage asset. This is made clear in the list description, the management guidelines and the incomplete Statement of Significance that underpins the assessment given in the Supplementary Heritage Statement.

The hardwood timber windows, the pivoting centrally-hung casements, the in-fill spandrel panels, the Georgian wired glass and the built-in shelving and ironmongery, constitute collectively a high proportion of original fabric and their removal would result in substantial harm to the listed building. It is precisely because the character of the building rests so much on the appearance of the facades, that this application is so damaging. The removal of most of the fabric of two elevations of flat 347 amount in proportional terms to substantial demolition of a listed structure.

Lastly, this present application fails to make the 'clear and convincing justification' required by the NPPF because it gives undue weight to just one option without reference or recourse to other possibilities - some of which have been previously initiated in other flats. Option proposed is, in the view of this assessment the most destructive in terms of fabric and character and it does not address the obvious and important performance issues in a heritage-led manner. For these reasons and in NPPF terms, this application would cause substantial harm to the listed building.

7.1 Conclusion

In not following the NPPF or Historic England policy or guidance, this application does not submit that which is required to properly assess the impact of the scheme on the building and it therefore not in compliance with the policy that governs our historic environment. No proper significant statement has been completed to support the application and that which has been started has been selectively used whilst the main assessment remains as a draft. No NPPF tests have been addressed in the Heritage Statement or the Design Statement, the latter relying on an immaterial clause from the Management Guidelines to justify the intervention. At Grade II* and as a relatively recent piece of design, Crescent House (1959-61) is in a select and important national group of buildings. Post-War buildings account for only 1% of all nationally designated heritage assets and Grade II* assets from any date are the top 9-10% of all listed buildings. The application of the listing criteria for Post-War buildings is understandably high and these three things combine to outline the national and indeed international heritage value of this asset.

The proposals, raised for understandable and justifiable reasons, fall considerably short of conservation and on the contrary amount to substantial harm to the listed building through unjustified demolition of some of the key elements of the listed building - elements that contribute strongly to its aesthetic and architectural character and that of the surrounding conservation area.

There has been an assumption in the last decade or more, that Post-War listed buildings should not be treated with the same degree of care and attentions that has previously been bestowed on the important architecture of earlier periods and that ill-founded notion is unfortunately prevalent in the supporting documents for this application. It is therefore the finding of this assessment that the application is not proportionate to the heritage asset. Moreover, it fails to meaningfully address the extensive and carefully raised heritage policy and guidance that governs the conservation and care of Crescent House and for those reasons this application must be refused.

Purcell

15, Bermondsey Square

08/06/22



Historic England

Ms Amy Williams

Direct Dial: 020 7973 3765

City of London Corporation

Guildhall, PO Box 270

Our ref: L01497273

London

EC2P 2EJ

26 May 2022

Dear Ms Williams

Arrangements for Handling Heritage Applications Direction 2021

347 CRESCENT HOUSE GOLDEN LANE ESTATE LONDON EC1Y 0SN
Application No. 22/00323/LBC

Thank you for your letter of 13 May 2022 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your Authority in determining the application.

Summary

Crescent House is highly significant as part of the post-war development of the City and the work of Chamberlain, Powell and Bon. It is particularly important as it marked a transition in their architectural style and experimentation with Brutalism which defined their work at the Barbican Estate. It is listed grade II*.

Crescent House, and the Goswell Road elevation in particular, is in need of repair. There are provisions with the Golden Lane Listed Building Management Guidelines SPD for repairs and best practice. These have, in my view, been followed in developing the pilot project for Flat 347 window repairs.

I support this work in principle as part of the on-going discussions to secure a long-term solution to the performance challenges of this building.



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Historic England would expect to be involved in the review of the pilot along with other stakeholders before a final solution is agreed.

Historic England Advice

Significance

The City of London has a long tradition of development and management of some of the finest historic buildings in 'the Square Mile' including the Guildhall, Mansion House and London Bridge. The Golden Lane and Barbican Estates are an important part of this legacy.

Developed just after the end of WWII, Golden Lane Estate was the City's response to the significant decline in its residential population since the turn of the century. Chamberlin, Powell and Bon (CPB) were appointed following a design competition and work began in 1952. The Estate is characterised by a series of rectilinear residential blocks and a community centre set in a carefully designed hard landscape. The structures themselves used innovative curtain wall systems and pioneered new approaches to the planning of post-war housing in Britain.

In contrast to this, Crescent House was designed as a separate phase of the Estate on additional land acquired by the City of London. Constructed in 1962, it marks a transition in architectural style of CPB and the influence of Brutalism, which defined their work for the City of London on the neighbouring Barbican Estate.

The Goswell Road elevation is particularly significant and is a marker of the City's eastern boundary with its distinctive stepped profile along the curved facade. The composition of the exposed concrete aggregate, the hardwood tilting windows and tile clad pilotis at ground level were all a departure from the earlier design of the Estate. The inner courtyard elevation takes a much simpler form with grey crittal windows. The flat interiors were carefully planned to maximise the use of space and light within compact residential units.

Crescent House is one of the jewels in the crown of the City of London's architectural legacy and widely admired for its unique style and innovation.

It illustrates in built form, the development of CPB's ideas which is highly significant given their key role in the evolution of post-war architecture in Britain. Its status as a grade II* listed building reflects this.

Impact

The current application seeks to replace all the existing windows in Flat 347 at Crescent House as a pilot project. The results will be used to assess the potential to replace all windows in this grade II* building.

The works, set out in 4.0 of the Design Statement, include:

- removing the existing window frames



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- assessing their condition
- increasing the rebates of the frame to allow for double glazing
- removal of the existing frames to install triple glazing.

This work builds on the work already done at Great Arthur House to replace the failing facade and will inform the next steps in the repairs project at Crescent House.

Policy

Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) 2021 sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Protecting and enhancing our historic environment is identified within the key environmental objective which delivers sustainable development.

Paragraph 199 gives great weight to conserving heritage assets in a manner appropriate to their significance, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 200 requires that any harm to a designated heritage asset should require 'clear and convincing justification'.

Paragraphs 202 states that in cases where proposals would lead to less than substantial harm to the significance of a designated heritage asset, this harm needs to be weighed against public benefits, and where appropriate, securing the optimum viable use.

The Golden Lane Listed Building Management Guidelines SPD sets out the significance of the estate and Crescent House in detail. Section 4.2.2 sets out the best practice guidance for the restoration of elevational elements including windows.

Position

It is clear that Crescent House, and the Goswell Road elevation in particular, is in need of repair.

The Golden Lane Listed Building Management Guidelines SPD set out the procedures for repairs. It identifies the steps to deal with failing components. This pilot project sits within this guidance as a trial sample. I have no objection, in principle, to these works.

There has been extensive work done throughout the pre-application process to assess



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significance of the original windows, the nature of the failings and scoping of repair methods and/or replacement. These proposals would result in some potential loss of historic fabric in one flat. However, the method statement states that if triple-glazed windows are deemed to be unsuitable, steps will be taken to return the windows to their existing appearance as far as possible. I am satisfied that these works are a reasonable next step in the scoping of the repairs project.

I note that there is accommodation within the method statement for stakeholders, including Historic England, to inspect, review and feedback on the pilot. This is welcomed.

It is also important that performance issues such as heating and ventilation are addressed as part of an holistic approach to the repair of the building. I trust that this will form part of our on-going discussions as part of the review of this pilot project.

Recommendation

Historic England has no objection to the application on heritage grounds.

We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 200 and 202.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the Local Planning Authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Breda Daly

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



Amy Williams
City of London Corporation
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Email: PLNComments@cityoflondon.gov.uk
Cc'd in: [REDACTED]

09 June 2022

Dear Amy Williams

RE: 22/00323/LBC

347 Crescent House, Golden Lane Estate, London, EC1Y 0SN

Thank you for consulting the Twentieth Century Society on the above application for Listed Building Consent for the “Replacement of existing single-glazed windows to Flat 347 with triple glazed windows, together with installation of insulation to internal walls of flat (temporary consent for 5 years).”

Context

The Society has been involved in pre-application discussions with Studio Partington and the City of London Corporation about the proposed façade renewal work. The Society’s Director and Caseworker attended a site visit, its Casework Committee then reviewed the pre-application proposals on 14 June 2021 and we provided feedback in the form of a letter on 25 June 2021. In our letter, we accepted the need to upgrade the windows and looked forward to receiving more information on the proposed approach. We have since been on site again to inspect the windows in flat 347 and to discuss the pilot application and overall scheme with the project team. We now wish to provide further feedback, outlined below (under ‘Comments’).

Heritage Assets and Policy

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

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Registered Charity no 1110244

Crescent House was built by Chamberlin, Powell and Bon in 1958-62, completing the Golden Lane Estate, which the architects designed for the City Corporation. It is a robust and expressive reinforced concrete structure, which is 'crescent'-shaped in response to the curve of Goswell Road. Crescent House contains shops and the Shakespeare public house on the ground floor, with flats above. It has stepped elevations of single-glazed hardwood timber windows (and some aluminium lights) with mosaic and muroglass panels, beneath exposed concrete, Maisons Jaoul inspired barrel vaults. Stylistically, Crescent House anticipated the design of the Barbican Estate, which the architects went on to build.

Crescent House is Grade II* listed "for its place in the evolution of post-war architecture and for the sophistication with which the contrasting materials and geometry of the façade are handled". It also falls within the Barbican and Golden Lane Conservation Area.

Great weight should be given to the conservation of the special interest of both designated heritage assets. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority [...] 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 72 requests that local authorities pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework (NPPF, 2021) includes paragraph 199 which states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 200 states that any harm to, or loss of, significance should require clear and convincing justification.

Comments

The Society understands and accepts that the original windows at Crescent House are now sixty years old and require significant refurbishment. We also appreciate that the City wishes to improve the environmental performance of the building. However the quality of the original very substantial hardwood sections was extremely high and as a result they have survived extraordinarily well, especially given the lack of recent maintenance. For both heritage and environmental reasons we would much prefer to see a solution which retained as much of the original fabric of the windows as possible.

From our site visits, it is clear that the majority of substantial areas of severe dilapidation are on the projecting bay windows, as opposed to the main plane of the glazing screen. Decay has been caused by the increased exposure of these elements, some aspects of original design details, and the detrimental impact of previous attempts at remedial work (such as the applied drips above the mosaic bands).

We understand from the Hallas Window Survey (2020) that the majority of the frames are original and are in good, repairable condition: "The survey showed that most of the timber in place is original. An estimate is 95% [...] The surveyors estimate of replacement timber required to repair the windows is no more than 10%. Therefore it is estimated that 85% of the original timber would remain if the windows are repaired rather than replaced." (p.6 of the report). We appreciate, however, that this survey was based on visual inspection, rather than destructive investigation and that these figures may change following a more detailed inspection of the fabric. The Hallas report concurs with our assessment saying "The inspection identified most defects are wet rot located on the bay window corners." (p.8).

Rather than using the trial project as an opportunity to construct a triple glazed solution across the whole bay, we recommend that a hybrid exploratory project is undertaken. This should retain the existing timber frames to the main plane of the glazing, and adjust it to take double glazed units (and double glazed aluminium casements, where these exist). The projecting bay should be carefully unpicked, to ensure that all available lessons as to why it has failed and what the nature and extent of previous alterations were, are learnt. This part of the window alone could then be reconstructed, taking care to replicate the appearance of joinery details, but using triple glazing. We also request that original window ironmongery and details, such as the exterior window cleaner's pole, are retained.

Because we think that this hybrid solution to the trial should be pursued, we recommend refusal of the current application for listed building consent for removal of the full window arrangement at flat 347.

The Society's offices are located at 70 Cowcross Street in Farringdon, a 10 minute walk from Crescent House, and we would be interested in visiting the site during the project to inspect the work and offer heritage advice.

We hope that these comments are of use to you. We would be grateful if you could please inform us of your decision on this application.

Yours sincerely,

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Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ – [REDACTED]

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www.c20society.org.uk