



PLANNING COMMITTEE REPORT

Development Management Service
Planning and Development Division
Environment and Regeneration Department
Town Hall
Upper Street
LONDON N1 2UD

PLANNING COMMITTEE	AGENDA ITEM NO: B2
Date:	05 November 2020

Application number	N/A
Application type	N/A
Ward	St Mary's
Listed building	Unlisted
Conservation area	Within 50m of Upper Street North (CA19) Conservation Area
Development Plan Context	Angel & Upper Street Key Area, Employment Growth Area
Licensing Implications	N/A
Site Address	218 Upper Street, Islington, London, N1 1RR
Proposal	To add 218 Upper Street to Islington's Register of Locally listed Buildings

Case Officer	Emma Lawrence
Owner	CP Plus (Trading) Ltd
Agent	Lichfields
Nominator	LBI Design & Conservation Team

1. RECOMMENDATION

- 1.1 The Committee advise the Corporate Director of Environment and Regeneration that they recommend that 218 Upper Street be formally adopted onto the Register of Locally Listed Buildings and Locally Significant Shopfronts.

2. SITE PLAN

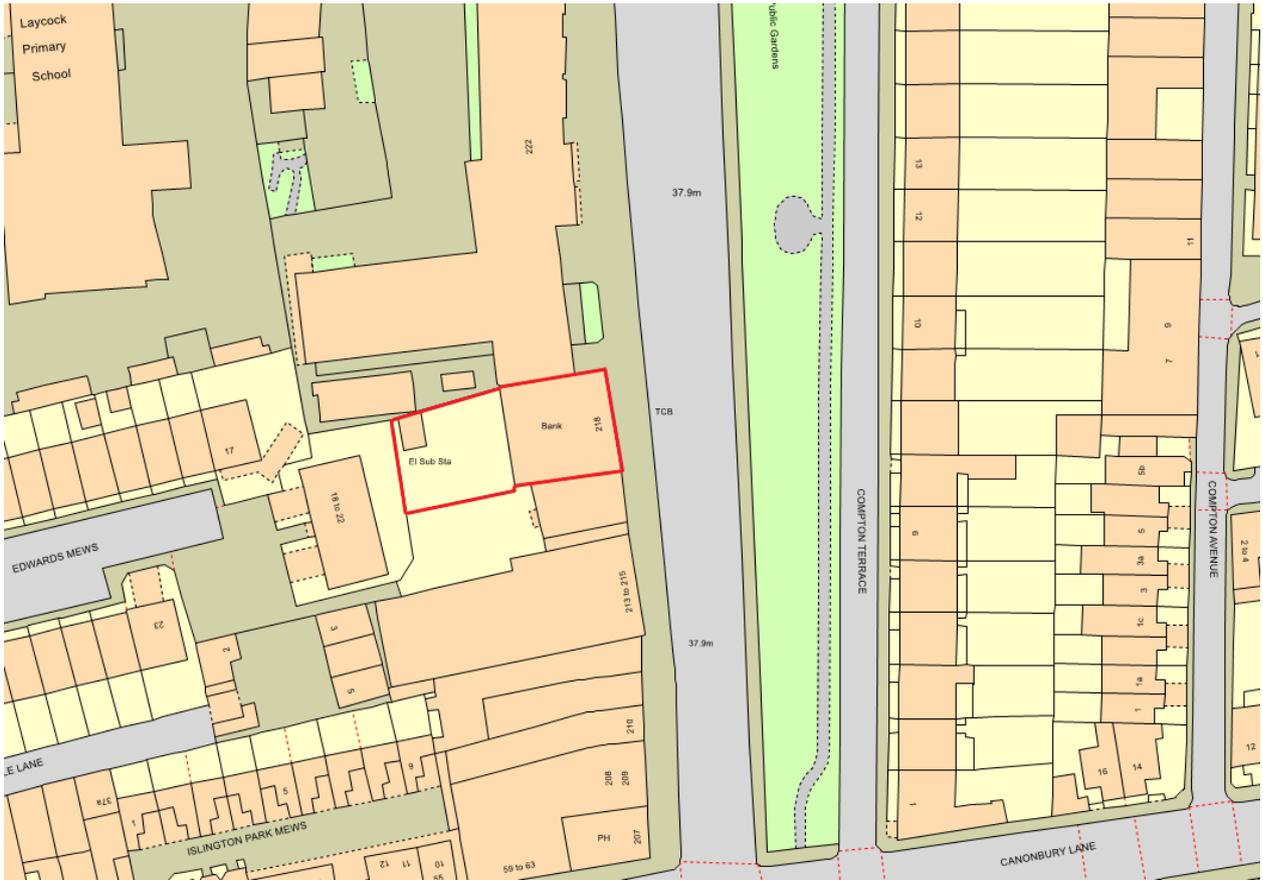


Image 1: Site location plan with property outlined in red

3. SITE PHOTOS

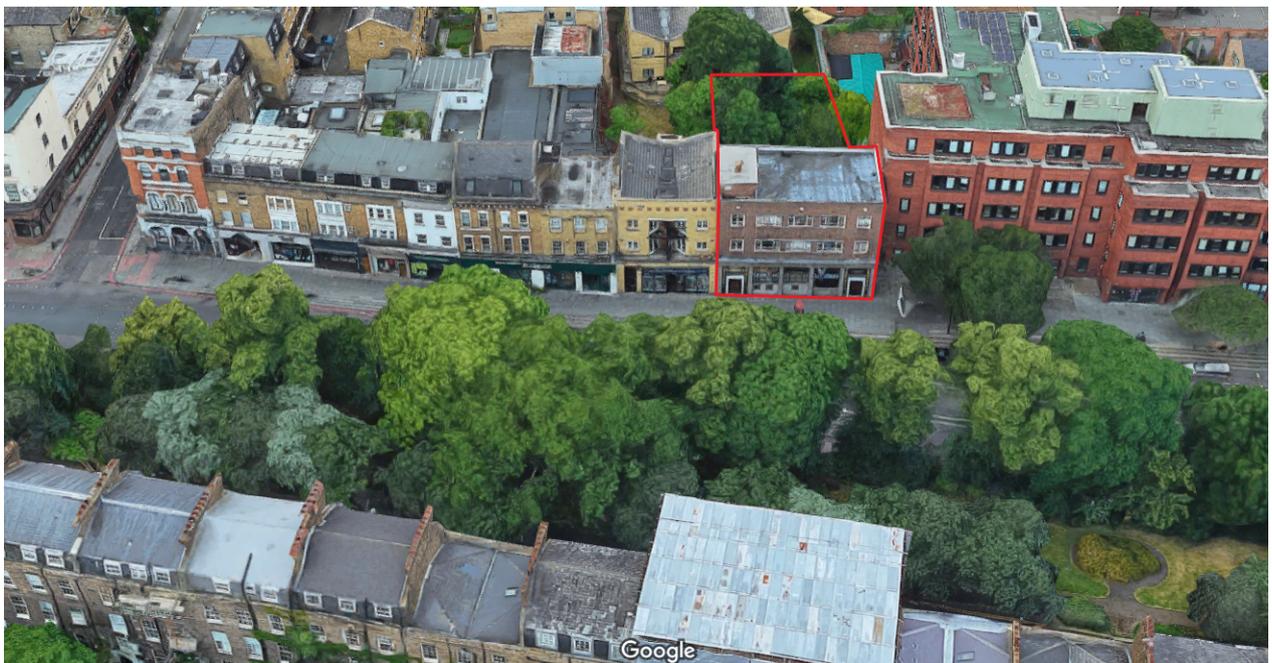


Image 2: Aerial view of the property (outlined in red)



Image 3: Front elevation onto Upper Street 2019



Image 4: National Provincial Bank branch at 218 Upper Street c.1953 (Source: RBS Archives)

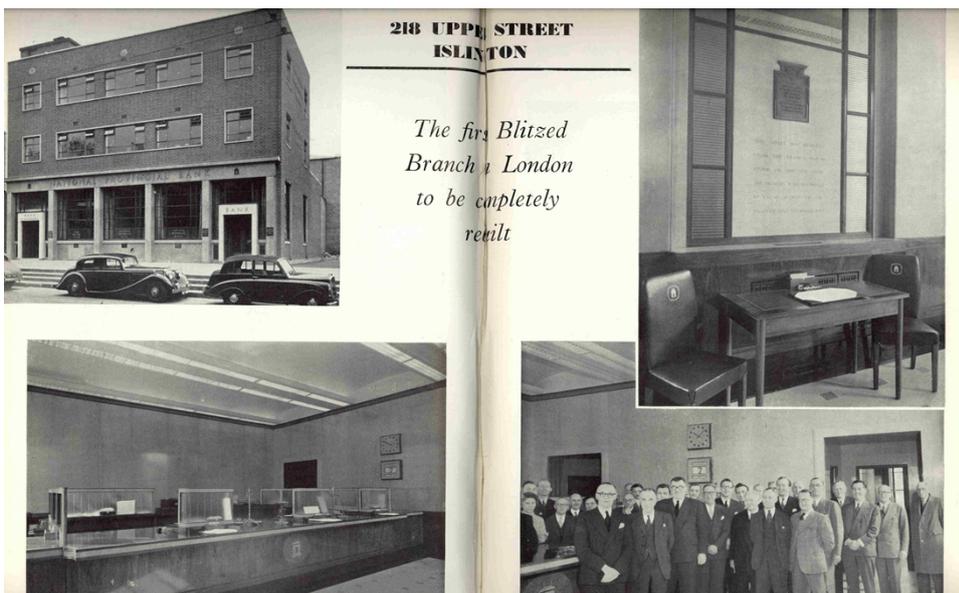


Image 5: Scanned article from The Natproban Journal (Source: RBS archives)

4. BACKGROUND

- 4.1 218 Upper Street has been identified as possessing local architectural and historic significance. It is considered that it complies with the selection criteria for additions to the Register of Locally listed buildings. Consequently it is recommended that 218 Upper Street be added to the Register of Locally Listed Buildings and Locally Significant Shopfronts.

Register of Locally Listed Buildings and Locally Significant Shopfronts

- 4.2 The Register of Locally Listed Buildings and Locally Significant Shopfronts (hereafter 'the Local List') is a list of buildings, structures and shopfronts in the borough which, whilst not listed by the Secretary of State for their national importance, are felt by the Council to be of local importance due to their local architectural, historical or environmental significance.
- 4.3 Buildings are added to the Local List in recognition of their value as irreplaceable heritage assets which contribute to the quality of the local built environment, enhance the local street scene and sustain a sense of Islington's local distinctiveness. Buildings may be included on the Local List either individually or as groups.
- 4.4 Inclusion on the Local List affords a building, structure or shopfront the category of 'non-designated heritage asset' under the National Planning Policy Framework 2019 (hereafter 'NPPF 2019'), though any building, structure or shopfront can be identified as a 'non-designated heritage asset' should its significance come to light during the planning process. The planning policy and guidance related to local listing is expanded upon in Section 7 of this report.
- 4.5 The purpose of the Local List is to ensure that care is taken over decisions affecting the future of these identified heritage assets, including alterations proposed through the planning process. As locally listed buildings are not statutory listed buildings (referred to as 'designated heritage assets' within the planning framework) there is no requirement for Listed Building Consent to carry out works to locally listed buildings. Instead, the usual planning controls apply, but the impact of proposals on the significance of locally listed buildings will be a consideration when deciding planning applications.

218 Upper Street: a 'non-designated heritage asset'

- 4.6 As with many properties in Upper Street, pre-application proposals have been put forward for the redevelopment of the site at 218 Upper Street. Such pre-application enquires are confidential, and while details of the proposal cannot therefore be provided in this report, considerable assessment and analysis of the building at 218 Upper Street has been undertaken by the Council, and this includes consideration by the Design and Conservation officers, who have identified the building as having local architectural and heritage significance.
- 4.7 The Islington Design Review Panel (DRP) have considered pre-application proposals relating to this site and building. The DRP advice is that there is an inherent architectural quality to this building which is both of its time and of note, describing it as being 'both elegant and considered and possessing notable decorative details'. As such they advised that the building contributes positively to the setting of the conservation area, forming a pleasing end-stop to the buildings of townscape quality on the western side of this part of Upper Street. They also consider that the building has a historic/communal value as the first bank branch in London to be rebuilt after the Blitz. They advised the Council that the building should be considered for addition to the Local List to add weight to its status as a non-designated heritage asset.
- 4.8 In August 2019 the Council made an application to Historic England for the building to be considered for listing at the national level. As set out in their Initial Assessment Report received in December 2019, Historic England determined that the building did not meet the high bar for listing in

the national context, however, they concluded that the building ‘possesses claims to local interest’.

- 4.9 Inclusion onto the Local List would formalise the Council’s current assessment of the building’s significance and its recognition of the building as a non-designated heritage asset, which has also been recognised by the DRP and Historic England.

5. SITE AND SURROUNDINGS

- 5.1 218 Upper Street is located on the raised pavement of the north-western end of Upper Street which is characterised as a traditional urban shopping street of mostly speculative 19th century traditional buildings. The building is three-storeys plus basement and was previously in use as a branch of the National Westminster Bank at ground floor and basement level and as separate offices on the upper floors.
- 5.2 The southern site boundary directly abuts the Upper Street North (CA19) Conservation Area and is within the setting of several other designated heritage assets (listed buildings) including the Grade I listed Union Chapel and the Grade II listed Compton Terrace on the opposite side of Upper Street.
- 5.3 To the rear of the site there are flats and houses on Edward Mews which are managed by a housing association. The Council offices at 222 Upper Street (5 storeys plus basement) adjoins the site to the north and obscures the historically unobscured northern elevation of the building, covering the second bay of the flank wall. The adjoining building to the south is in retail use at ground floor level with residential units at first and second floor level.

6. ASSESSMENT OF HERITAGE SIGNIFICANCE

Methodology

- 6.1 The Glossary of the NPPF 2019 defines a ‘heritage asset’ as:

‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).’ (Annex 2: Glossary pg. 67)

- 6.2 And defines ‘significance’ as:

‘The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’ (Annex 2: Glossary pg. 71).

- 6.3 Historic England Advice Note 7: Local Heritage Listing (2016) suggests that when assessing the significance of a potential heritage asset on a local level, English Heritage’s Conservation Principles (2008) provides a framework for understanding all the values that contribute to its significance (pg. 11). Conservation Principles describes the four values which contribute to heritage significance as: evidential, historical, aesthetic and communal value.
- 6.4 On the basis of these definitions, the Council created and agreed its own local list procedure and criteria in 2012. In order to be recommended for addition to the Local List, a building or site must have demonstrable local or regional architectural, historic, or artistic value, or be of an age, rarity and integrity or local character and distinctiveness to merit inclusion.
- 6.5 218 Upper Street has been assessed against these criteria in the Council’s Nomination Report. The report sets out the architectural and historic context for the building and describes the external and

internal fabric of the building, before assessing the building against the local selection criteria.

Summary of the architectural and historic context of 218 Upper Street

- 6.6 Historically, Upper Street formed part of the cattle and sheep droving route to Smithfield Market and was an important coaching route into the city. Development during the 18th and 19th centuries established it as a residential suburb, and during the 19th century many of Upper Street's terraced houses were converted or rebuilt to serve as commercial premises.
- 6.7 A study of historic Ordnance Survey mapping of the northern Upper Street area shows two buildings on two plots with gardens on the eastern portion of the site of 218 Upper Street in the 1870s. The site was occupied by a mourning wear provider c.1859-1869, but in 1873, The National Provincial Bank of England moved their Islington branch from premises at 173 Upper Street to 218 Upper Street. In September 1940, the 19th century building was all but destroyed by a bomb and so the branch moved to temporary premises at 23 Compton Terrace.
- 6.8 In c.1953 the existing building at 218 Upper Street was built for National Provincial Bank (the successor of The National Provincial Bank of England) to replace the damaged building. The building was designed in a contemporary style by National Provincial Bank's in-house architect, B.C. Sherren.
- 6.9 National Provincial Bank ('NPB') had operated with their own in-house architects – W.F.C. Holden and F.C.R. Palmer – from the early 20th century. The pair designed prolifically in a neo-classical style. Their designs were lauded by architecture critics at the time and a number of their buildings are now statutorily listed.
- 6.10 After Palmer's death in 1935, Holden became the Chief Architect at NPB and is responsible for the entirely modernist GII listed NPB Osterley branch (1935). The Osterley branch marks the evolution of NPB's in-house style to the contemporary, however, with the outbreak of WWII the building of new banks stopped all together.
- 6.11 Post-war branches were designed in an entirely new environment, with planning controls having been introduced and a reaction against pseudo-Georgian commercial designs by local authorities. NPB continued to demonstrate its commitment to contemporary architecture with a series of new modernist banks designed by B.C. Sherren as Chief Architect, including the building at 218 Upper Street. Another of B.C. Sherren's surviving bank buildings is the GII listed branch at Plymouth (1958) which was the headquarters of NPB in the South West.
- 6.12 It is within this context that 218 Upper Street was designed and built.

Summary of the description of the fabric of 218 Upper Street

- 6.13 Exterior: The principal, east, elevation to Upper Street is of three storeys, plus a small, set-back roof access structure on the roof. At ground floor the elevation is five bays wide and is comprised of Devon grey granite with entrance surrounds to the former bank and bank chambers in Nobresina marble, with teak window frames and entrance doors (a very similar door arrangement to the GII listed Plymouth branch). The facing bricks to the first and second floors are mixed Bedford Grey hand-made sandfaced facings. The fenestration on the upper floors echoes the five bay arrangement below with three crittal-style windows in stone surrounds with brick pilasters between over the three central bays, and single windows over the remaining two bays at each end of the building.
- 6.14 At the time of construction, 218 Upper Street was free standing owing to the damage to the range of buildings on this side of Upper Street during the Blitz, however, the Council's offices at 222 Upper Street now cover the second bay of the building's northern elevation. The basement and ground

floor are in reinforced concrete and the first and second floors are of steel frame construction with external walls of load-bearing brickwork.

- 6.15 The principal elevation features idiosyncratic classical motifs in three roundels between the second floor windows and roof parapet, and the teak doors each feature two large bronze coins inlaid to the door handles. The motifs are copied from British, Irish and ancient Greek coins and are continuation of the designs of earlier NPB architect, Holden who applied the same motifs on the stainless steel doors of the GII listed National Provincial Bank in Coventry (1929) and a number of other NPB branches that he and Palmer designed together. Sherren also went on to repeat this coin motif on the bronze doors of the GII listed Plymouth branch. In including these motifs on a building of his own design, it is clear that Sherren was continuing the in-house style of NPB at 218 Upper Street.
- 6.16 To the rear of the building, the basement storey and ground floor act as a podium for the recessed upper storeys. The rear elevation is five bays wide and the original windows, including teak windows of the same quality and design to those on the front survive.
- 6.17 Interior: the building's principal space, the banking hall, which originally spanned two of the three middle glazed bays of the frontage, was entered directly through the northern set of doors on the front elevation. A separate commercial space was accessed through the southern set of doors which took the remaining glazed bay of the frontage. The partition which separated these two spaces has been removed. Suspended ceilings have been inserted though the original ceiling survives above, and the area to the rear of the banking hall has been subdivided by later partitions. Parquet flooring survives to the floor throughout, though the walls appear to have been clad. However, opening up has revealed that the window on the flank elevation survives (though damaged) and the building at 222 Upper Street is built directly abutting it. This suggests earlier finishes may exist beneath the cladding (plasterboard), and the original timber panelling survives on the northern internal wall.
- 6.18 The two original stairs at front and rear to the basement survive with original banisters, and the plan-form at that level is more in-tact, with the original vault with safe door and safe-stores and some joinery still in place. The original staircase to the bank chambers on the upper floors is accessed by the southern set of doors. The staircase bannisters and railings are of a bespoke design and good quality and have architectural interest. To the upper floors the plan-form largely survives with some later partitions to form small cubical/meeting rooms. The parquet floor and joinery is consistent on each floor and the degree of intervention is minimal.

Assessment of 218 Upper Street against local listing selection criteria

- 6.19 Architectural significance: It is considered that the building represents an inventive re-working of traditional bank architecture, rationalising Classical forms to create a quietly-commanding building in which an impression of robustness is combined with clean modernity. The building's architectural effect is achieved by its clean surfaces and proportions rather than ornamentation and decoration is judiciously placed to enhance, rather than detract from, the building's form. The building also derives architectural value from its high-quality materials, including granite, marble, hand-made bricks and with teak windows and doors, parquet floors, bespoke metal staircase and railings and original vault and safes, as well as the integration of artistic features such as stone or plaster decorative roundels, and bronze coin door handles.
- 6.20 The design of 218 Upper Street, can be read as both continuation of the NPB in-house style set down by lauded bank architects, Palmer and Holden, and an interpretation of the Classicism of the Italian Rationalists as imagined by Sherren. The branch at 218 Upper street pre-dates Sherren's grander and celebrated designs such as at Canterbury (1957 demolished), and his notable GII listed Plymouth branch, but it can be read as an earlier iteration for these design as it has a certain rhythm and symmetry of proportions, that were repeated at Canterbury, and later at Plymouth. On both of those later buildings Sherren also repeats decorative precedents established in the design of 218 Upper Street. Whilst the Upper Street branch is more modest in its overall impact, the building draws

on the local context for its effect in terms of its scale and materiality and so should not be dismissed for its modesty.

- 6.21 Historic significance: The building has historic local significance for its having been the first bomb-damaged bank branch in London to be rebuilt after WWII, and possibly the first bank branch designed by notable bank architect Sherren during his tenure as Chief Architect for NPB.
- 6.22 Artistic significance: It is considered that the decorative elements of the building's design have some artistic value, however, they contribute more meaningfully to the overall architectural significance of the building rather than having artistic significance in their own right.
- 6.23 Age, rarity and integrity: 218 Upper Street was built c.1950-3 on the site of the bomb damaged NPB branch of 1873 that it replaced. It is considered that the date of 218 Upper Street directly contributes to its architectural and historic interest; having been built so close to the end of WWII and to replace a building damaged by enemy action, the building embodies a cultural heritage of rebuilding and continuity in the post-war period. As with other examples of post-war architecture the modernity of the building can be read both as an invitation to bear witness to that community rebuilding and, over time, to erase it.
- 6.24 Historic England's Commerce and Exchange Buildings: Listing Selection Guide (2017) which considers the value of commercial buildings from the perspective of statutory listing states that *'Post-war banks of note are few in number'* and that *'listing in the past has favoured the opulent and the grand at the expense of the more modest...consequently, the latter have suffered disproportionate loss'*. It goes on to advise that statutory listing should aim to redress this balance where special historic interest clearly resides in unadorned fabric on the grounds of rarity.
- 6.25 When considering the bank at 218 Upper Street for inclusion onto the statutory list, Historic England concluded that although an early example of a 1950s bank, it did not display the 'high level' of architectural and historic interest required for listing buildings at this date. However, within the local context, the building is one of a smaller number of architect-designed, early commercial buildings in this area of the borough and so has claim to some value based on its local rarity. Linked to this, the purpose-built high street bank is now a rare and diminishing building type (particularly those built in the 20th century) and so it is considered that the branch at 218 Upper Street has increasing evidential value as an architect designed, purpose-built branch building.
- 6.26 As in other surviving examples of mid-century commercial architecture, there have been a number of alterations to the building consistent with changing technology and approaches to banking and customer relations. Nevertheless, externally the building is remarkably similar to how it appeared when first built. Internally, 218 Upper Street does retain interior features of interest, however, it is the integrity of the composition and design of the building externally which holds the greatest architectural significance, as well as its associative and historic value as a bank designed by Sherren and the first in London to be rebuilt after the Blitz.
- 6.27 Local character and distinctiveness: This criterion recognises that buildings can have group value with other buildings in the townscape which contribute to the character of an area. Upper Street has been a commercial street since the 19th century as it formed the route to Smithfields Market in the City of London. A bank building has existed on, or directly adjacent to the site of 218 Upper Street since 1873, and the building on the site now allows for that commercial use and longevity to be read in the wider context of the high-street. The northern end of Upper Street can be read as a small town in its own right, with its residential terraces such as Compton Terrace (GII listed), public houses, Union Chapel (GI listed) and the green in front of Compton Terrace. The building at 218 contributes to the narrative of the development of Upper Street and has group value with the character of the surrounding townscape and the setting of designated heritage assets.

Conclusion

6.28 When considering the building at 218 Upper Street for inclusion onto the statutory list, Historic England concluded that the building possesses claims to local interest and the assessment above has found that the building has strong evidential, aesthetic and historic value. It is considered that the building mostly satisfies the following local listing criteria:

- I (a) Architectural significance;
- II (a) Historic significance;
- IV (a) Age, rarity and integrity;
- V (a) (b) Local character and distinctiveness.

6.29 For the reasons above, it is recommended that the building be added to the Local List.

7. RELEVANT POLICY AND GUIDANCE

7.1 Chapter 16 of the NPPF 2019 sets out the national framework for conserving and enhancing the historic environment. Paragraph 184 of the NPPF 2019 recognises that ‘heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites...’.

7.2 Paragraph 190 of the NPPF 2019 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal and take into account the available evidence and any necessary expertise.

7.3 In line with this policy, during the course of the assessment of pre-application proposals, 218 Upper Street was identified as a potential heritage asset and an assessment of its significance was made. That assessment found that the building was of local architectural, historic and environmental interest and the building has been afforded the status of a ‘non-designated heritage asset’ under all subsequent pre-application discussions. This is a material consideration in the planning process and triggers a number of policy considerations related to the conservation of heritage assets. These policies include:

NPPF 2019

7.4 Paragraph 197 which directs local planning authorities to take into account ‘the effect of an application on the significance on a non-designated heritage asset’ in determining applications. In weighing applications that directly or indirectly affect non-designated heritage assets, the NPPF 2019 requires that ‘a balanced judgement’ should be taken ‘having regard to the scale of any harm or loss and the significance of the asset’.

7.5 Paragraph 198 which states that local planning authorities ‘should not permit the loss of the whole or part of a heritage asset [including non-designated heritage assets] without taking all reasonable steps to ensure that the new development will proceed after the loss has occurred’.

Development Plan

7.6 Policy 7.8 ‘Heritage assets and archaeology’ of the London Plan (2016) which directs boroughs to identify London’s heritage assets and historic environment to ensure that development values, conserves, restore, re-uses and incorporates heritage assets where appropriate. Part D of the policy requires that ‘Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail’.

7.7 Part B of Policy CS9 ‘Protecting and enhancing Islington’s built and historic environment’ of Islington’s Core Strategy (2011) which states that ‘the historic significance of Islington’s Unique

heritage assets and historic environment will be conserved and enhanced whether designated or not'.

- 7.8 Part A of Policy DM2.3 'Heritage' which states that Islington's historic environment is 'an irreplaceable resource and that the Council will ensure that the borough's heritage assets are conserved and enhanced in a manner appropriate to their significance'.
- 7.9 Part E of Policy DM2.3 'Heritage' which states that 'Non-designated heritage assets, including locally listed buildings and shopfronts, should be identified early in the design process for any development proposal which may impact on their significance. The council will encourage the retention, repair and reuse of non-designated heritage assets. Proposals that unjustifiably harm the significance of a non-designated heritage asset will generally not be permitted.'

Guidance and SPD/SPGs

- 7.10 Locally listed buildings are also subject to the following guidance and SPD/SPGs:
- The Planning Practice Guidance: Conserving and enhancing the historic environment (2019)
 - Historic England Advice Note 2: Making Changes to Heritage Assets (2016)
 - Historic England GPA3: The Setting of Heritage Assets (2nd edition)
 - Historic England Advice Note 7: Local Heritage Listing (2016)
 - Islington's Urban Design Guide 2017
 - Conservation Area Design Guidelines

8. PLANNING HISTORY

- 8.1 The planning history at 218 Upper Street is limited to minor works associated with its former use as a bank.

Planning permission

- 8.2 900933: Installation of automated service till to Upper Street Elevation. Approved 09/08/1990.

Advert consent

- 8.3 900934: Installation of an illuminated cash dispenser sign and a projecting box sign. Approved 09/08/1990.
- 8.4 0850558: Installation and display of the words 'National Westminster Bank' in Perspex letters 8'-12' high on the north flank wall between 25' and 29' from pavement level. Approved 11/07/1985.

9. CONSULTATION

- 9.1 A letter was sent to the owner of 218 Upper Street on 29/09/2020 notifying them of the Council's consideration of 218 Upper Street for inclusion onto the Local List. The letter invited comments in favour of, or against, the inclusion of the building onto the Local list.
- 9.2 A response was received on 20/10/2020 in objection to inclusion of the building onto the Local List. Lichfields (on behalf of the owners) have objected to the inclusion of 218 onto the Local List and have included an assessment by Montagu Evans in support of this objection.
- 9.3 The overarching argument of the objection to the addition of the building to the Local List is that the building is 'of its time', of 'limited architectural quality' and not an example of 'innovation in design or construction' with later internal refurbishment having degraded its integrity.

- 9.4 The objection also makes the argument that the omission of the building from select literature on local architecture and bank design suggests it is not of particular local interest. The objection also argues that the building cannot be definitively said to have been designed by Sherren due to the name of the Assistant Architect in Charge having been included in an article about the building, published in *The Builder* (30 July 1954, Vol. 175).

Response to the objection

- 9.5 In order to be considered for addition to the Local List, the heritage significance of the building in question is assessed against the Selection Criteria to ensure that due consideration is given to the quality and architectural and/or historic values of the heritage asset. As has been shown in paragraphs 6.19 to 6.29, 218 Upper Street complies with the Selection Criteria for Additions to the Local List.
- 9.6 The objection is couched in the terminology and considerations of national designation where buildings that are 'of their time' are more often than not, not considered to meet the high bar for national designation. Similarly the national list often requires buildings to be 'innovative in design and construction' in order to delineate what is worthy of statutory protection and the legal implications which follow (especially with regards to buildings post-1840), however this is not the case for the Local List.
- 9.7 Arguably the Local List is more generous and nuanced than the national list because it allows for the protection of a sense of place through the recognition and listing of locally distinctive and significant buildings and structures that contribute positively to the borough's townscape. In contrast, the national list acts to preserve buildings or monuments by virtue of their singular high levels of significance. Section 6 of this report has set out how 218 Upper Street contributes to local character and distinctiveness as well as possessing other values which meet the criteria for local listing.
- 9.8 Similarly, the omission of the building from literature on bank design that has a national scope is not surprising, and its omission from Pevsner and Alec Forshaw's book on Islington's 20th century architecture is not a determination on the building's quality, as neither act as a comprehensive catalogue of what is of note and what can be disregarded. That the significance of a building has been overlooked should not preclude a reassessment of its importance; to do so would go against national planning policy which requires local authorities to identify and assess significance when considering proposals.
- 9.9 Lastly, it is agreed that the attribution of buildings to individual architects when many, if not most, work with assistants is not concrete. The Midland Bank at 100 King Street, Manchester is attributed to Sir Edwin Lutyens (1869-1944) who worked collaboratively with the architecture practice of Whinney, Son and Austen Hall on the design. That this was the case does not diminish Lutyens' contribution or the attribution. In the same vein, Sir George Gilbert Scott (1811-1878) is well known to have worked with assistants from 1860 onwards, however, buildings designed by his office after this date are still attributed to him.
- 9.10 The design of 218 Upper Street is known to have come out of the NPB architects' office at the time of Sherren's tenure as Chief Architect and he is named as NPB's Architect in the article from *The Builder*, therefore, it is reasonable to suggest that he was involved in the design of the building. Being a local branch one would expect that an Assistant would have been involved in the build and construction rather than Sherren himself, and this might be the reason for his inclusion alongside the contractors in the article. Attribution aside, it has been demonstrated that the building meets numerous local selection criteria and its inclusion onto the Local List is not contingent on Sherren having designed the building.

10. IMPLICATIONS

Financial implications

- 10.1 The addition of the building to the Local List will have no financial implications for the Council.

Legal implications

- 10.2 It is considered that the addition of the building to the Local List will not have any significant legal implications. Local listing does not bring any additional planning controls although the recognition of the building as a non-designated heritage asset is a material planning consideration.

Environmental implications

- 10.3 It is considered that there will be little-to-no environmental implications connected to the addition of the building to the Local List. There is potential for positive effects through a reduction in the extent of demolition and loss of embodied carbon should the addition of the building to the Local List impact on the acceptability of the extent of demolition. Additionally the local listing for the building might encourage a 'retro-first' approach to the building where the existing premises is retrofitted for re-use rather than demolished in whole, or in part.

11. CONCLUSION

- 11.1 The building at 218 Upper Street has been identified as possessing local architectural and historic significance as outlined above. It has been demonstrated that the building possesses values which accord with the Council's selection criteria for additions to the Local List. Consequently it is recommended that 218 Upper Street be added to the Local List.

Appendix 1. Copy of Initial Assessment Report by Historic England

Appendix 2. Selection Criteria for Additions to the Local List

Appendix 3. Copy of objection from Lichfield's (Agent)

Appendix 4. Copy of article from The Builder (30 July 1954, Vol. 175)