

Claire Sutton
Design & Conservation Team Manager
Planning Service
Planning and Development
PO Box 333
222 Upper Street
London
N1 1YA

By email to: 

Date: 19 October 2020

Our ref: 16626/02/NG/LAy/18938930v5

Your ref: Local List nomination – 218 Upper Street, Islington

Dear Claire

Local List nomination – 218 Upper Street, Islington

We are writing to you on behalf of our client, CP Plus (Trading) Ltd, in response to your letter dated 29 September 2020 in which you advised that 218 Upper Street was being considered for inclusion on Islington's Register of Locally Listed Buildings (Local List). Our client wishes to make a representation against nomination for inclusion of 218 Upper Street on the Local List. This letter sets out an analysis of the building against the criteria for inclusion on the Local List.

As the analysis demonstrates, it is clear that 218 Upper Street does not meet the standard for local listing. Its limited architectural quality on a local level, subsequent unsympathetic alteration, express exclusion from the Upper Street Conservation Area, lack of commensurate level of artistic interest and limited association with B.C. Sherren as Chief Architect to the National Provincial Bank means the building does not meet the local listing criteria.

The building has neither been included in the comprehensive 'Pevsner' Buildings of England volume on North London (updated in 1998) nor Alec Forshaw's extensive survey, *"20th Century Building's in Islington"* (2000). No. 218 Upper Street has also been excluded from studies on the topic of post-war bank buildings.

The quality of 218 Upper Street does not match those post-war buildings that have been included on the Local List, nor does it match the quality of many other 20th century buildings in Islington which have not been locally listed. Careful selection is necessary to maintain defensible thresholds for the Local List and to include 218 Upper Street would call into question whether the threshold for selection is adequate to ensure designation as a 'Locally Listed Building' remains meaningful within the planning process.

Historic background of the building

The existing building at 218 Upper Street replaced an earlier bank of 1873 which was destroyed by bomb damage during the Second World War. The current building on the site was built in 1953 as a local bank branch for the National Provincial Bank (NPB). It occupied two plots with the bank located in the northern three bays and the two southern bays were let as a shop.

During the time the bank branch was built, B.C. Sherren was Chief Architect to the NPB and F.N. James was Assistant Architect to the NPB. An article on the building in *The Builder* (30 July 1954, Vol. 175) stated the

Assistant Architect-in-Charge for the project was H.S. Smith, the Consulting Engineer was Douglas S. Young and the Builders were C.P. Roberts & Co. Ltd. This indicates that while Sherren was involved, it's unlikely the building was designed by him, given H.S. Smith was the project architect. Sherren more likely provided oversight and guidance on house style and other corporate requirements rather than being directly responsible for this particular bank branch.

The building is faced in reddish-brown brickwork on the upper levels with horizontal bands of fenestration and six air vents above the windows. The building features Devon grey granite framing to the ground floor, limestone door surrounds, timber doors and windows and four bronze circular door pulls. There are three further stone roundels on the parapet. The ground floor centre and centre-left window bays have been raised (subsequent to the original design, to accommodate automatic teller machines), affecting the symmetrical appearance of the building. The bank signage has been removed, as well as the automatic teller machines. Internally, the building has been substantially altered and the plan form is not of interest.

The building remained in use as a NatWest bank branch until its closure in 2017, and the building has been unused since this time. Proposals for redevelopment of the Site have undergone extensive consultation with the Council and the Design Review Panel since 2018.

In 2019 Historic England received a listing application from an unknown source, requesting Historic England review the building at 218 Upper Street for inclusion on the Local List. Historic England undertook the assessment in December 2019 and concluded that *“Based on the information provided, whilst possessing claims to local interest, the bank at 218 Upper Street, Islington, does not meet the criteria for listing in the national context”*.

It should be noted that Historic England did not definitively state that the building was of local interest but that it ‘possessed claims’ to it; therefore this assessment has been undertaken to assess the building against the relevant local listing criteria.

Assessment of the building against the selection criteria for additions to the Register of Locally Listed Buildings

The following table sets out an analysis of the building against each of the criteria for local listing as set out by the London Borough of Islington as set out in your letter dated 29 September 2020. The assessment has been undertaken based upon review of the Islington Local List (PDF copy with descriptions dating to 2010 and review of the current Islington Interactive Map showing locally listed building locations), and review of Historic England guidance and other digital secondary sources.

In addition to the desk-based research above, this assessment has been undertaken following review of the research report on 218 Upper Street prepared by Roger Bowdler for Montagu Evans (October 2020). Roger worked as a Listing Inspector from 2001 and was involved in the reform of the heritage protection system. He helped introduce publicly available criteria for assessment, the digitisation of the National Heritage List for England and other reforms which modernised the way buildings and places were protected in the planning system. In 2011 he became Director of Listing, and in 2014 joined the executive team of Historic England on its creation. The report is included as an annex to this letter for reference purposes.

Table 1 Assessment of 218 Upper Street against Local Listing selection criteria

1. Architectural significance	
A. Sites or structures which are locally or regionally important by virtue of the	The building is of a standard mid-century commercial style; Historic England (HE) acknowledges in its Decision Not to List (Dec. 19) that <i>“in many respects, it is a typical 1950s commercial building”</i> and that <i>“the elevations are rather austere”</i> . HE’s report also notes that <i>“the application of traditional detailing to a more stripped-back design is by no means unique,</i>

<p>quality of their design, decoration, material, construction or craftsmanship</p>	<p><i>having been used as early as 1935”, at the Halifax Bank in Kingston-upon-Thames”</i> which also was deemed not worthy of statutory listing. HE’s report states <i>“the former bank at 218 Upper Street does not display the high level of architectural interest required for listing buildings of this date ... particularly apparent when compared with Sherren’s Plymouth design.”</i> Even when considered amongst the wider category of post-war commercial buildings (rather than just post-war commercial banks, which were few in number) Historic England concludes <i>“it is a typical example of a 1950s commercial building and does not compare well with the best examples from the post-war period”</i>.</p> <p>No. 218 Upper Street’s mid-century character is derived from its traditional materials, symmetry and decoration with its modern construction, fenestration and austere appearance. In a report which assessed the history and significance of the building, prepared by Montagu Evans (2020), the building’s design was described as an <i>‘austere and hesitant approach’</i> and a transitional style. No. 218 Upper Street is <i>an</i> example of local, altered, post-war architecture, but not the <i>best</i> local example of post-war architecture.</p> <p>The design quality, construction and craftsmanship are unremarkable. The building comprises a reinforced concrete basement, external flank walls as retaining walls and first and second floors of steel frame with load-bearing brickwork. The materials display a limited variety of quality materials at ground floor with the upper elevations being in the more traditional brick; however the integrity of the ground floor materials has been degraded with the alterations to the centre and centre-left window bays and stall risers. The materials and design are not representative of local or regional distinctiveness but rather belong to the age of national and global sources for materials and design influences.</p> <p>It is notable that the HE <i>“Guidance on the Late 20th-Century Commercial Office”</i> (2016) states that in January 1954, David Eccles, Minister of Works, <i>“called on the financial sector to commission ‘new materials, methods and designs to produce buildings of real character’”</i> indicating that the post-war conservative and austere architecture was lacking in ‘real character’ – (though there are notable exceptions which have been acknowledged through statutory listing, including the Time and Life Building in Westminster, 1951-3, Grade II*).</p> <p>An article about 218 Upper Street was included in the architectural press, being an early rebuilding of a bomb-damaged local bank branch, but this does not inherently bestow upon it interest as there are many building typologies which could make the same claim. We are aware that an extract from the National Provincial Bank Review dated autumn 1954 refers to 218 Upper Street as ‘the first blitzed branch in London to be completely rebuilt’; we understand this reference to mean that it was the first bank branch of the National Provincial Bank to be rebuilt in London, but not necessarily the first of any bank’s branches to be rebuilt in London following the Second World War.</p> <p>The building is not mentioned in the relevant volume of <i>“The Buildings of England: London 4 – North”</i> (1998), which is part of one of the most comprehensive surveys of the architecture of Great Britain which covers both buildings of note and lesser known buildings of interest; the omission indicates 218 Upper Street was not of interest to Pevsner (who undertook the original survey) or subsequent editor Bridget Cherry who, when undertaking the revisions to the series, specifically looked at 20th century architecture.¹ Nor is it mentioned in Alec Forshaw’s <i>“20th Century Buildings in Islington”</i> (2000), which was a comprehensive survey of hundreds of modern buildings undertaken by the borough’s former conservation officer. This indicates it is not of particular local architectural interest or even worthy of mention.</p> <p>Combined with its limited architectural interest (limited even on a local level when first built), there have been substantial alterations: changes to the windows externally have altered the original symmetrical proportions of the façade and degraded the rhythm of its external</p>
---	---

¹ <https://www.theguardian.com/culture/2001/jun/20/artsfeatures.arts>

	<p>composition; the loss of the plan form and removal of banking hall fixtures, fittings means the interior is not of interest; and the loss of external signage and loss of use of the building as a bank branch means that to the average passer-by, the building's former nature as a bank branch cannot be understood. The local architectural interest as a late 20th century commercial building (which it possessed in an unaltered state) has been compromised and is not of a quality meriting designation as a locally listed building. This is particularly evident when comparing against the few post-war buildings which have been included on the local list (see section 4 below).</p>
B. Sites or structures designed by locally or regionally significant architects	<p>While the bank branch was built while B.C. Sherren served as Chief Architect to the National Provincial Bank, this does not mean he designed all of the buildings himself, but rather that he was the titular head of the architects' department (with F.N. James as the second in command as Assistant Architect to the Bank). It's likely Sherren's involvement in the design of this branch was at a managerial level, given H.S. Smith was named as the architect in charge for the project. When one compares this building to Sherren's other works, this building's quality is considerably lower, raising doubt about the level of his involvement in its design which has otherwise previously been assumed by Historic England and LB Islington.</p> <p>Online research into H.S. Smith, the Assistant Architect-in-Charge for the project, has not revealed any other buildings of note which he designed nor has the research revealed anything further about his career as an architect. He does not appear to be recognised as a locally or regionally significant architect.</p>
C. Sites or structures which as a group form a locally or regionally important architectural unity or example of urban planning (such as squares, circuses, crescents and terraces).	<p>The building at No. 218 occupies two plots, breaking from the traditional format of the street which had narrow plots running east and west perpendicular to the main road. It contributes to the loss of fine-grain development that is characteristic of the older buildings along Upper Street that evidences the high-street's long-standing evolution as an early principal north-south route out of London, redeveloped and refronted over time but still retaining the narrow plot widths.</p> <p>Stylistically, and in terms of its built form (projecting at upper floors further forward than the general building line of 19th century terraced structures along the street) No. 218 contrasts with the conservation area. This is evident in the conservation area boundary which expressly excludes both 218 Upper Street and the adjacent Council offices from the boundary of the conservation area, stepping around them to then include the east side of Upper Street north of the Council offices.</p> <p>As part of the evidence of the original narrow plot layouts along the high street, 218 Upper Street does not contribute to an understanding of the street's original urban form. Its break with the traditional fine grain does reflect 218 Upper Street's nature as a post-war building; however, it does not form part of any group of post-war buildings, given the 1980s Council building is situated to the north and the building to the south appears to be a late-20th century construction. Therefore, it not merit designation as part of a coherent group forming a locally or regionally important architectural unity or example of urban planning.</p>
2. Historic significance	
A. Sites or structures which illustrate important aspects of local or regional social, economic, cultural or military history or have close historical association with local or regional important people or	<p>No. 218 Upper Street is not of significance as a representative of bank branch architecture. It is not mentioned in the definitive study of bank architecture, John Booker's <i>"Temples of Mammon: The Architecture of Banking"</i> (1991), which includes a list of significant banks which were published in the architectural press. The building has limited status as a local bank branch, not a central town bank or a headquarters.</p> <p>HE's Decision Not to List (Dec. 19) notes that the building is not of particular interest for its interior as the bank did not have an innovative plan when constructed and has been subsequently substantially altered, <i>"masking... any real sense of its former banking function"</i>. Its former banking function is also masked by the loss of external signage indicating its former purpose.</p>

<p>events</p>	<p>Historic England’s Listing Selection Guide on Commerce and Exchange Buildings (2017) notes that <i>post-war banks of note are few in number</i>’ but acknowledges that the best examples have been listed, including the former Barclays bank in Maidstone and the former National Provincial Bank in Plymouth, both Grade II listed.</p> <p>The building forms one of many commercial buildings on the high street, which also includes other banks. It is not of particular local or regional interest for association with important people or events.</p>
<p>3. Artistic significance</p>	
<p>A. Sites or structures (particularly sculpture and public art) which are locally or regionally important for the interest of their artistic design, decoration, material, construction or craftsmanship</p>	<p>The building features four bronze roundel door handles and three stone roundels on the parapet. The four at ground floor comprise a swan and chicken on the left doors, and an archer and helmeted figure, each straddling a dolphin, on the right doors; some include Greek inscriptions including the ungrammatical inscription ‘TAPAL’. The upper coins reflect more recent inspiration including three flowers with interlocked stems (a British 1950 threepenny coin design), a star and a sheaf of wheat resembling a 20th century Italian coin. The upper coins are too distant to be legible without magnification.</p> <p>Coins were not unusual sources for bank buildings – earlier examples of the use of coins on banks includes a row of ancient coin motifs on the mezzanine gallery at Lloyd’s Bank’s headquarters at 15-22 Cornhill in London (1927-30) and series of coin motifs on the stainless steel doors (and around the architrave) at the National Provincial Bank on Broadgate in Coventry, dating to 1930 and Grade II listed. The doors on the NPB in Coventry were designed by W.F.C. Holden and included British, Irish and ancient Greek coin motifs. The list entry for the Coventry NPB building notes that the same motifs were used on the doors of other NPB branches at Southend-on-Sea, Middlesbrough, Luton and New Bond Street in London all in bronze, and at Guildford and Maidenhead in mahogany.</p> <p>The coins at 218 Upper Street represent the end of a corporate theme for the NPB, rather than innovative or unique artistic expression. The archer upon the dolphin, the chicken and the sheaf of wheat appear to be direct copies, or very near so, to those on the doors of the Coventry branch. They are an amateur reuse of other much earlier patterns.</p> <p>The coin roundels on the parapet are awkwardly applied as decoration and not integrated into the design of the building; they sit awkwardly in relation to the air vents on the parapet, appearing as an after-thought. Those on the doors are better incorporated into the design, but overall it is clear the coin roundels are not integral to the design of the façade and any limited artistic interest lies in the roundels specifically and not to their part in a wider Neoclassical or Neo-Greek composition. This is in contrast to Coventry Branch, of which the coin motifs formed part of a wider Neoclassical design.</p> <p>While the coin motifs are the most decorative element of this particular building externally, many historic buildings retain isolated elements of pleasant artistic detailing and to include them all on the Local List would be to reduce the value of the distinction of being ‘locally listed’ for local importance.</p> <p>To locally list 218 Upper Street on the basis of the coin roundels would have implications for a wide range of buildings with isolated and applied elements of decoration and could set a precedent for any small amount of applied decoration meaning a building would be worthy of inclusion on the Local List. It is notable that 203 Upper Street which has decorative terracotta panels in a band above the first floor windows has not been included on the Local List. There are also other examples of earlier buildings, such as 213-215 Upper Street, which feature select decorative features – in this instance, attractive ornate metal railings beneath the first floor windows on 213-215 Upper Street – but overall the artistic merit of the building is limited. The same is the case for 218 Upper Street.</p> <p>Overall the coin motifs at 218 Upper Street appear as an unsophisticated use of superficial, applied decoration reusing earlier designs to enliven an otherwise austere façade, and while</p>

	the roundels may be unique in their local context on Upper Street, their presence on the building does not merit the inclusion of the entirety of the building on the Local List.
B. Sites or structures designed by locally or regionally significant artists	The artist or designer of the roundels is not definitively known but as noted above, a number of the coin motifs appear to be direct copies (or very nearly so) of coin motifs designed by W.F.C. Holden for the Coventry NPB branch, designed in dating to 1930. 'Greek' text has been added to some of the roundels, in one case the phrase 'TAPAL' which is ungrammatical in Greek. If any of the coins are not copies of earlier NPG coin motifs used on a number of other earlier branches, they may have been the work of the architect in charge of the project, H.S. Smith. Research on Smith has not identified any further buildings or artistic works of his.
4. Age, rarity and integrity	
A. Sites or structures which are important for their age, rarity or integrity.	<p>Regarding integrity, as discussed above, the exterior retains a semblance of its original appearance, but this has been detrimentally altered. The interior has lost its original features which would have otherwise lent it interest as a post-war local bank branch. Therefore on the basis of integrity, it does not meet the criteria for local listing.</p> <p>Regarding age, the vast majority of buildings on the local list (those on the PDF list dated 2010; it is not possible to search for locally listed buildings of a particular date on the Islington Council Interactive Map) are 19th century buildings. This indicates that 'age' has been used to identify which buildings merit local listing, to ensure the preservation of historic buildings which, although not of a special architectural or historic interest deserving statutory listing, contribute to the historic streetscape and which the Council wishes to preserve.</p> <p>There are very few late 20th century buildings on the local list, indicating very few have been considered to merit local listing. A review of the locally listed buildings dating to the 1950s (contemporaneous with 218 Upper Street) as well as locally listed buildings dating to the 1960s, has been undertaken.</p> <p>There are three buildings on the PDF Local List which are noted as dating to the 1950s; one comprises Haywards Place though this was allegedly designed in 1834 and rebuilt in facsimile in 1951. St Joan of Arc Roman Catholic Church, dating to 1959, is noted a fine example of its period; it has a unique shape and modern Gothic design of local interest. The third building, Ashmount Primary School (1957-58), was identified by LB Islington as having heritage significance which derived from its glazed curtain wall façade, as it was believed to be one of the first buildings in Britain to be completely clad in glass. (Planning permission has since been granted for replacement of the glazed curtain wall due to its failure and the original building has been replaced.) Both buildings are unique and pioneering designs which although not meriting statutory listing, were identified as being of significant local interest. In comparison, 218 Upper Street is a relatively standard post-war commercial structure.</p> <p>A review of 1960s buildings was also undertaken; St Gabriel's Roman Catholic Church, dating to 1966, was included on the Local List as a strikingly modern design with a rounded brick wall and concrete and glass pavilions.</p> <p>Given the lack of 1950s buildings (and, indeed later 20th century buildings) on the list, it's clear a higher bar is set for them given the amount of construction undertaken in the post-war period.</p> <p>Regarding rarity, it is noted that 218 Upper Street has claim to being one of the earliest bank branches in London (and the first bank branch of the NPB in London) rebuilt in London in the post-war period. However, designation on the basis that the building is the first, or one of the earliest, of its type during a very specific period of time, in a specific locality, doesn't account for whether it's the best of its type, or whether that period of time was particularly important for the development of that building typology.</p> <p>Local designation on the basis that a building was one of the earliest of its typology to be rebuilt in the post-war period opens up the risk that quite a wide range of poor quality buildings would be of 'heritage interest' meriting preservation on the basis of being the first,</p>

	<p>or very early example, of their type to be rebuilt in the post-war period. For example, Islington's first town hall built in the post-war period was the Municipal Offices at No. 222 Upper Street.² We would question whether on this basis the Council offices are of interest and worthy of local listing as Islington's first post-war Council offices; it could be posited that they are part of development of the town hall typology and of historical interest as evidence of post-war needs for increased provision of greater public services. To include all buildings on this basis would have the effect of reducing the value of inclusion on the Local List.</p>
<p>5. Local character and distinctiveness</p>	
<p>A. Sites or structures that make a positive contribution to local character and distinctiveness in terms of streetscape, townscape or landscape value</p>	<p>There are many buildings on Upper Street which contribute to the local street scene and local variety. Indeed a high number of them have been locally listed, evidencing their local importance. Some buildings along the high street have not been locally listed, notably those of lower architectural quality or those which have been somewhat altered, though in theory they too contribute positively to local character and distinctiveness as part of the streetscape. Considering whether 218 Upper Street merits inclusion on the Local List, taking into account the assessment above, calls into question whether quite a wide range of other buildings would need to be considered for inclusion on the local list if 218 Upper Street is of a such quality. This would undermine the criteria for selection of buildings which <i>are</i> locally important and which should be added to the Local List.</p> <p>For example, the following are not locally listed but contribute to character of the streetscape:</p> <ul style="list-style-type: none"> - 131-132 Upper Street – This building has a similar façade design to 218 Upper Street. The building is split over two plots, with a similar red brick upper façade with horizontal emphasis to the windows, and a stone frontage to ground floor with some alterations, as at 218 Upper Street, to the ground floor. - 23-24 Upper Street – This features a distinctive upper elevation with brown and stock brick banding and carefully considered Art-Deco influenced patterning to the red and brown brick detailing. There are alterations to the windows and the ground floor. - 40-42 Upper Street, Devon House – The stripped modernist style with horizontal emphasis in the windows on the upper levels contributes to the local street scene as contrast to the earlier buildings nearby. - Islington Fire Station at 278 Upper Street – It is noted in HE's guidance on Postmodern Architecture (2017) as being 'the most distinctive' of the new fire and police stations required following rationalisation of the public estate. We would question why 218 merits inclusion on the Local List when other buildings of more widely recognised quality (see Section 1 above) are not included on the list. <p>Buildings are generally 'of their time', reflecting the architectural tastes, available materials, and current building standards of the period in which they were built. As a result they tell the story of the development of an area. While the building at No. 218 forms part of the history of Upper Street, so do the wide variety of other non-designated 20th century buildings both within and outside the Upper Street Conservation Area. No. 218 Upper Street should not be included on the Local List solely because it is indicative of early post-war redevelopment, especially given the limited architectural quality and alterations which have degraded its appearance.</p> <p>Inclusion of standard and undistinguished buildings but which are 'of their time' could result in the need to designate a very large number of buildings, cheapening the status of inclusion on the Local List. Careful selection is needed to ensure that the designation of 'local listing' has value and meaning whilst allowing for high-quality and locally distinctive new buildings to be</p>

² John East and Nicola Rutt, "Islington Town Hall and Assembly Rooms", *The Civic Plunge Revisited*, C20 Society, 24 March 2012.

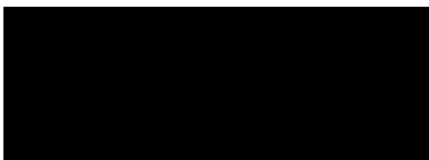
	constructed within the streetscape.
B. Sites or structures that possess group value with or make a positive contribution to the setting of other heritage assets	<p>It is notable that in relation to the Upper Street Conservation Area boundary, except at the southern end of Upper Street, where some buildings are excluded on the west side of Upper Street, at nowhere else along Upper Street was the decision taken to exclude 20th century commercial buildings, even those of limited quality. Conversely, the building at 218 Upper Street was excluded along with the Council offices adjacent to it.</p> <p>The conservation area Design Guidelines notes that ‘the existing buildings in the area were built on small, narrow fronted plots which gives buildings in the area a strong vertical emphasis’ and that ‘this verticality is one of the main physical characteristics to be conserved’. It is likely that at least partly on this basis, 218 Upper Street was considered to degrade this character of fine grain and vertical emphasis reflecting the street’s early narrow plot layouts, so was excluded.</p> <p>It is acknowledged that attitudes to the value 20th century buildings have changed over time, but we would question the degree to which the building at 218 Upper Street plays a significant role in the conservation area’s setting (other than by proximity), on the basis that it diverges from the fundamental character and appearance of the conservation area which merited its designation. It was not noted in the revised version of <i>“The Buildings of England: London 4 – North”</i> (1998), which took account of all kinds of architectural styles, indicating it was not identified as being an important part of the group of buildings along Upper Street. It neither forms part of a grouping of post-war buildings of interest, nor does it form part of a group with the earlier buildings elsewhere on Upper Street.</p>

Conclusions

The analysis above demonstrates that the building is ‘of its time’ and forms part of the story of the development of Upper Street, despite being at odds with the townscape characteristics noted in the Design Guidelines as being integral to the high street’s character. However, it does not sufficiently meet the selection criteria for the Local List given its limited architectural quality even on a local level when first built; its subsequent alteration removing the bank signage, loss of symmetry due to external alterations, and comprehensive internal refurbishment degrading its integrity; its lack of innovation in design or construction distinguishing it from other 1950s commercial buildings; its exclusion from comprehensive studies of 20th century buildings in Islington as well as studies on post-war banks; its project architect whose work is otherwise unknown or unremarkable and likely limited involvement of Sherren in its design; and the amateur quality of the superficially applied roundels, most of which appear to have been designs reused from much earlier NPB banks.

When compared with the very limited number of other late 20th century buildings on the Local List, the quality of 218 Upper Street does not match those that have been included, or even those that haven’t yet been included on the list but are otherwise recognised as being of good quality for their type or period. The claim to local interest due to it being the first National Provincial Bank branch rebuilt in the post-war period is true but we would question whether this is a useful measure for meriting inclusion on the Local List given the vast number of other buildings which would therefore merit inclusion on this basis, including the Council Offices themselves at 222 Upper Street. The effect of including a building on this basis would be to diminish the value of designation as part of the Local List.

Yours sincerely





Enclosure: "Former Natwest Bank, 218-219 Upper Street, Islington, Historical Assessment" (October 2020),
by Montagu Evans