

June 2023

Heritage Statement

County Hotel, Upper Woburn Place

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1.0 Introduction

- 1.1. This Heritage Statement has been prepared to support the planning application for works to the County Hotel, Upper Woburn Place, Bloomsbury:

The replacement of windows across all elevations, and replacement roof plant and associated works

- 1.2. The site is located on the eastern side of Upper Woburn Place, on the corner with Woburn Walk. The building has been in hotel use since its erection in 1940. The proposals seek to upgrade the hotel accommodation which no longer meets market requirements as well as being extensively dilapidated.
- 1.3. The existing building is not individually subject to any local or statutory heritage designation. It is located within the Bloomsbury Conservation Area with designated heritage assets within the immediate area.
- 1.4. The purpose of this report is to describe the heritage significance of any heritage assets potentially affected by the proposed development, and to consider the potential impact of the proposals on that significance. It seeks to satisfy the requirements of paragraph 194 of the National Planning Policy Framework (NPPF) (2021), and to assist in discharging the duties at sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.5. The scope of this report deals with the above-ground heritage constraints. It has been informed by desk-top research and a site visit made in April 2023.

2.0 Site Context

Heritage designations

2.1. Heritage assets are defined in Annex 2 of the National Planning Policy Framework (NPPF) (2021) as:

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

2.2. The site is located within the Bloomsbury Conservation Area.

2.3. Immediately to the south is the British Medical Association House including screen and gates, listed at Grade II (ref. 1378968).

2.4. Immediately to the east on Woburn Walk is the Grade II* listed Nos. 4-18 (even) including Nos. 4A and 6A (ref. 1379210), and Nos. 1-9 (odd) and No. 9A (ref. 1379209). There are also two Grade II listed lampposts on Woburn Walk (ref. 1379211); these are street furniture with an urban setting that will not be affected by the proposed development.

2.5. On the western side of Upper Woburn Place to the north is the Hilton Hotel London Euston and attached railings, listed at Grade II (ref. 1379065).

2.6. Given the urban character of the townscape in this location alongside the modest nature of the proposals, heritage assets within the wider area will not be affected by the proposed development.

2.7. An online search of the Greater London Historic Environment Record (HER) did not yield any additional potential heritage assets considered relevant to the proposals.

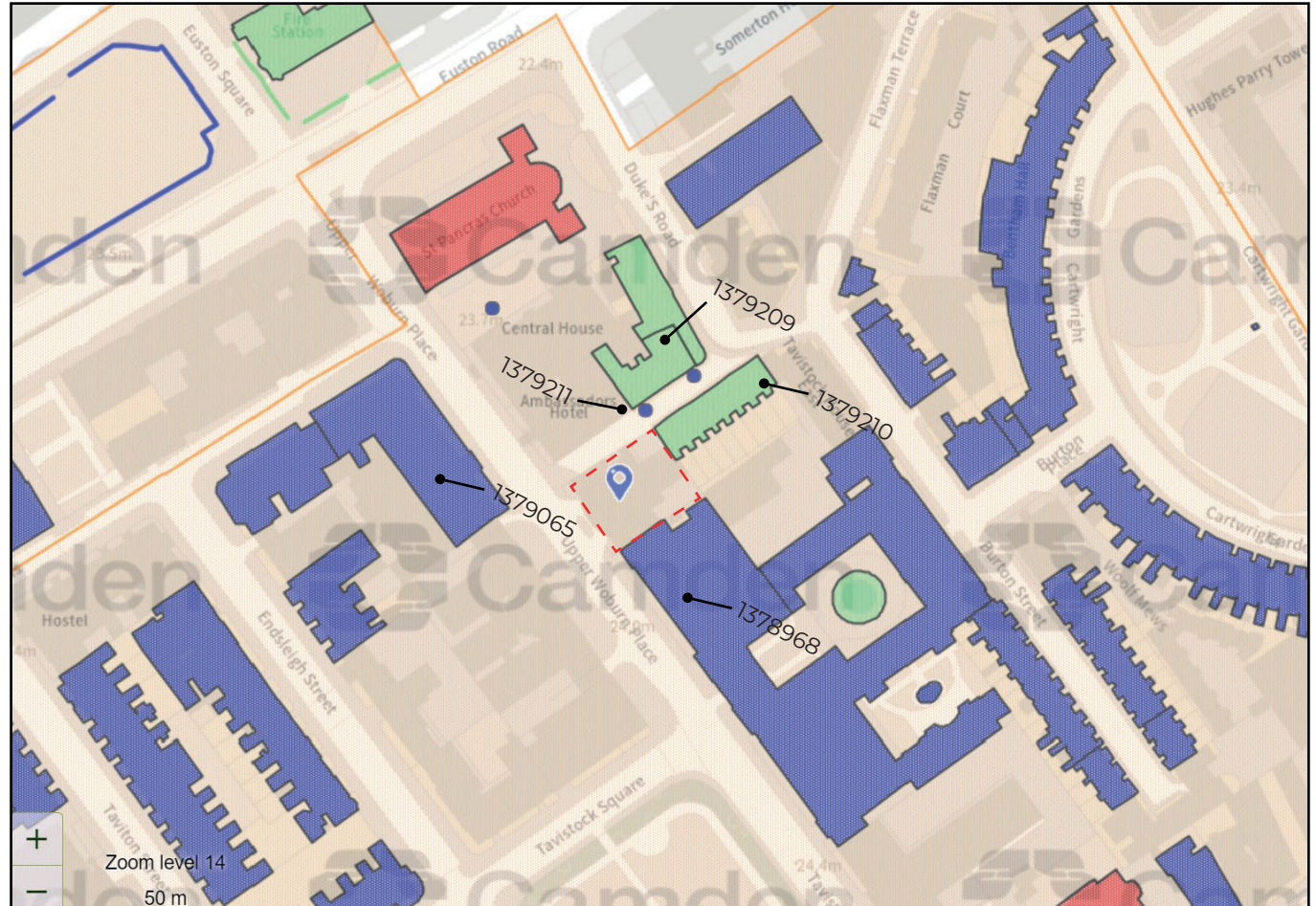


Fig.1. Heritage Constraints, London Borough of Camden interactive map, London Borough of Camden

LocalList	ListedBuilding
Building or Group of Buildings	Grade I
Natural Features or Landscape	Grade II
Street Feature or other Structures	Grade II*
	ConservationArea

3.0 Legislation, Policies and Guidance

3.1. This section sets out a summary of the core heritage decision-making framework. It is not intended to be exhaustive.

Legislation

3.2. The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes powers to designate listed buildings and conservation areas together with a statutory duty to consider the impacts of proposed development in the determination of planning applications.

3.3. Section 1 makes provision for the Secretary of State to compile lists of buildings of special architectural or historic interest. Section 5 defines a 'listed building' to include any object or structure fixed to the building, and any object or structure within the curtilage of the building which forms part of the land and has done so since before 1st July 1948.

3.4. Section 66 establishes a similar duty with respect to the determination of planning applications. In considering whether to grant planning permission which affects a listed building or its setting, local planning authorities 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.

3.5. Section 69 of the Act establishes powers for local planning authorities to designate areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance as conservation areas.

3.6. Section 72 establishes a general duty in the exercise of planning functions with respect to any buildings or other land within a conservation area to pay special attention to

the desirability of preserving or enhancing the character or appearance of that area.

Local Plan

Camden Local Plan (2017)

3.7. The Camden Local Plan sets out the policy provision against which planning applications in Camden are determined. It was adopted in July 2017 and replaced the Core Strategy and Camden Development Policies documents.

3.8. The primary heritage policy reads as follows:

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or 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;

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

c. conservation by grant-funding or some form of 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.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;

g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and

h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Listed Buildings

Listed buildings are designated heritage

assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

i. resist the total or substantial demolition of a listed building;

j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and

k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non designated heritage assets (including those on and off the local list),

Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

3.9. The implementation of Local Plan Policy D2 is supported by the Bloomsbury Conservation Area Appraisal and Management Strategy.

This was adopted on 18 April 2011. The appraisal notes that the character of the Bloomsbury Conservation Area is vulnerable to negative change through the incremental deterioration of built fabric arising from neglect and lack of maintenance (paragraph 5.9).

London Plan 2021

3.10. The London Plan 2021 sets out policies to guide development across the London boroughs. 'Policy HC1 Heritage conservation and growth' is the principal historic environment policy. It establishes the following policies for decision making.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they

should set out strategies for their repair and re-use.

National Planning Policy

3.11. National planning policy is established in the National Planning Policy Framework (NPPF) (2021). Chapter 16 (paragraphs 189-208) sets out policy guidance for development affecting the historic environment.

3.12. Paragraph 189 recognises that heritage assets are an irreplaceable resource and should be conserved in a manner that is appropriate to their significance such that they can be enjoyed by existing and future generations.

3.13. Paragraph 194 requires applicants to describe the heritage significance of any heritage assets affected by a proposed development, including the contribution made by their setting. This should be proportionate to the assets' importance, and no more than is required to understand the potential nature of the impact on that significance. Paragraph 190 requires local planning authorities to assess the significance of any heritage assets potentially affected to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposed development.

3.14. Paragraph 197 states that in determining planning applications, local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness.

3.15. Paragraphs 199 onwards provide guidance for considering the potential impacts. Paragraph 199 states that when considering the impact of

- a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This should be proportionate to its significance, the more important the asset, the greater the weight should be. This is irrespective of whether the harm is substantial, total loss, or less than substantial.
- 3.16. Paragraph 200 goes on to state that any harm to, or loss of, the significance of a designated heritage asset, including through development within its setting, should require clear and convincing justification.
- 3.17. Paragraph 200 and 201 deal with instances of substantial harm to a designated heritage asset. Development causing substantial harm should be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or other criteria are met. Paragraph 202 guides that where a development would lead to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use.
- 3.18. The tests at 201 and 202 deal with designated heritage assets. Paragraph 203 provides guidance on development affecting non-designated heritage assets, stating that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset.
- 3.19. Paragraph 206 encourages local planning authorities to look for opportunities for new development within the setting of heritage assets and conservation areas to enhance or better reveal their significance. Those proposals that preserve elements of the setting that make a positive contribution to the asset should be treated favourably.
- 3.20. Paragraph 207 makes clear that not all elements of a conservation area will necessarily contribute to its significance.
- Planning Guidance**
- 2.1. Interpretation of the NPPF is provided by the Planning Practice Guidance (PPG). This is a digital guidance note divided into a series of chapters which is subject to regular review; the historic environment chapter was last updated in July 2019.
- 2.2. The historic environment chapter guides that understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm (paragraph 8). Paragraph 13 provides further guidance on setting, making clear that setting is not only related to visual attributes but other environmental factors such as noise, dust, smell and vibration as well as the relationship between places.
- 2.3. Paragraph 18 provides guidance on assessing harm. It is clear that proposed development may have no impact or may enhance an asset's significance such that no harm is caused. Where development would be harmful to a designated heritage asset, this needs to be categorised as either 'less than substantial' or 'substantial' harm. The level of harm can vary within these two categories. It goes to elaborate that substantial harm is a 'high test' and therefore is unlikely to arise in many cases. This harm may arise from works to the asset or from development within its setting.
- 2.4. Paragraph 19 provides guidance on how to assess the possibility of harm to conservation areas. It states that an unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building. The justification for a building's proposed demolition will need to be proportionate to its relative significance
- 2.5. Guidance on the optimum viable use of heritage assets and how to determine this is provided at Paragraph: 015 Reference ID: 18a-015-20190723. It states that the vast majority of heritage assets are in private ownership and therefore sustaining heritage assets in the long term often requires an incentive for their active conservation. It goes on to recognise that putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. With regards to the optimum viable use, it guides that if there is only one viable use, that use is the optimum viable use. If however there is several economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset. The optimum viable use may not necessarily be the most economically viable one and is not necessarily the original use. If from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.
- Professional Guidance**
- 2.6. Historic England has produced a series of best practice guidance notes to assist in the identification of assets, assessing significance and managing change. Those of particular relevance include:
- Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008)
 - Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2 (2015)
 - The Setting of Heritage Assets: Historic Environment Good Practice Advice in

- Planning Note 3 (Second Edition) (2017)
- Statements of Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12 (2019)

4.0 Brief History

- 4.1. The area of Bloomsbury developed from the mid-17th century onwards as London expanded northwards. The later expansion was carried out speculatively by builders with leases from major landowners, with the aim of attracting the wealthier classes through the construction of grander residences. This has created an area of townscape which follows a relatively consistent form characterised by terraced houses on a formal gridded arrangement punctuated by landscaped squares.
- 4.2. In the later 19th and into the 20th century, institutions began to characterise areas of the district, creating a hub of medical, academic and cultural uses.
- 4.3. In the late 19th century, the site and its surroundings very much formed part of the earlier 18th and 19th townscape for which Bloomsbury is renown. The site was occupied by a terrace of houses which characterised this stretch of Upper Woburn Place, echoed on the opposite side of the road. The gridded spatial arrangement of the townscape is evident, with a landscaped square to the rear of the site.
- 4.4. Much the same arrangement is shown on the 1896 Ordnance Survey (OS) plan.

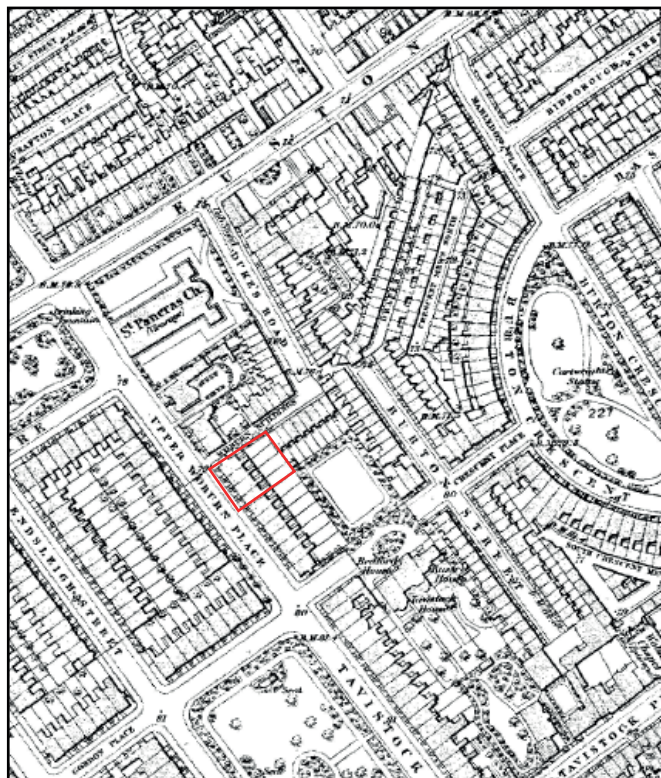


Fig. 2. 1875-1878 Ordnance Survey

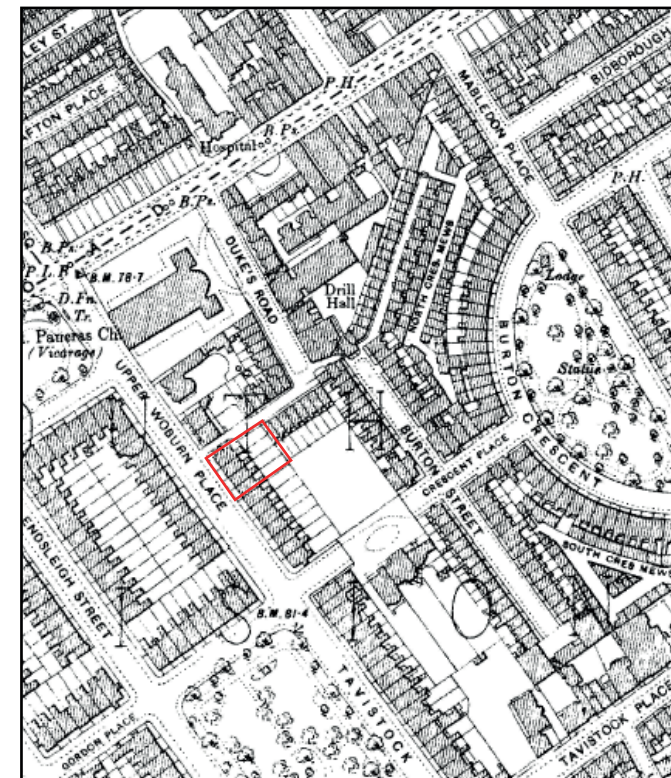


Fig. 3. 1896 Ordnance Survey



Fig. 4. 1916 Ordnance Survey

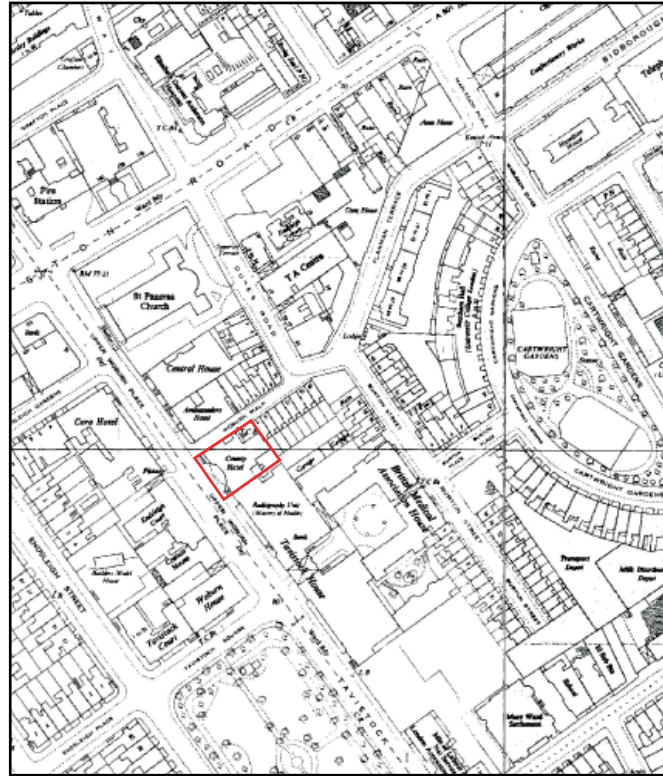


Fig. 5. 1953-54 Ordnance Survey

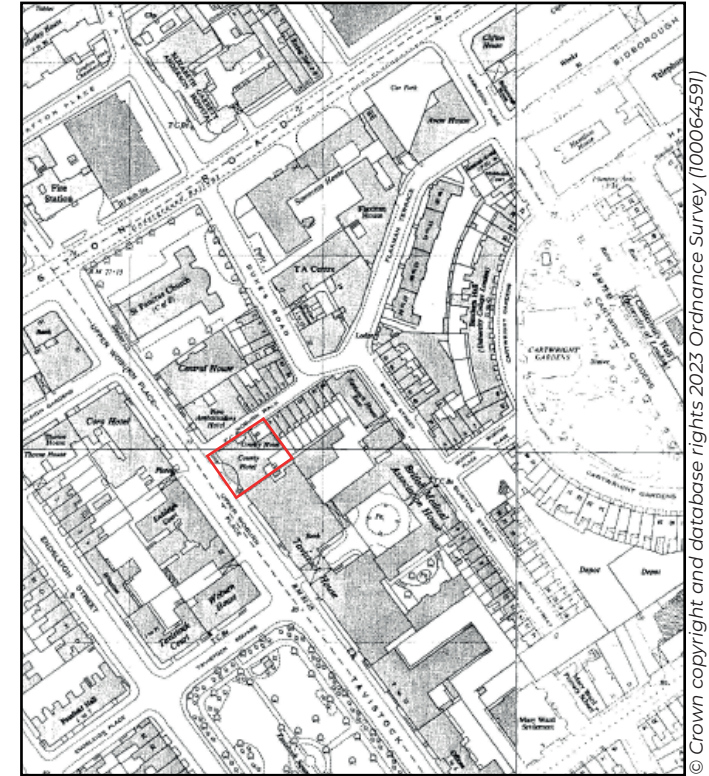


Fig. 6. 1965-70 Ordnance Survey

4.5. By the time of the First World War, the first phase of the headquarters of the British Medical Association had been constructed on Burton Street to the east of the site. The site itself remained occupied by the four terraced properties.

4.6. The houses on the site were demolished to make way for the County Hotel which opened in 1940 to a design by C Lovett Gill. It forms part of a wider townscapes transformation along Upper Woburn Place and Tavistock Square which also saw the continued expansion of the British Medical Association and the redevelopment of the western side of the road with larger footprint buildings in place of the terraced development, including Endsleigh Court immediately opposite the site.

5.0 Statement of Significance

Introduction

- 5.1. Determining significance is a professional judgement taking into account the designation status, desk-top research and fieldwork. The assessment should seek to understand the nature, extent and level of significance, and should be proportionate to the relative importance of the asset.¹
- 5.2. The NPPF defines significance as 'the value of a heritage asset to this and future generations because of its heritage interest'. This interest may be archaeological, architectural, artistic or historic. An understanding of significance must therefore derive from the heritage interest/s of the heritage asset.

Bloomsbury Conservation Area

- 5.3. The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted on 18 April 2011. At section 3.0 it sets out a summary of the special interest. It describes that Bloomsbury is representative of London's early expansion northwards from c1660 through to the Georgian and Regency periods, replacing medieval manors and open land with a mix of houses, a market, commercial, cultural uses, hospitals and churches. The northern part of the conservation area represents the later expansion and focussed on creating grander residential areas for London's wealthy. Much of the construction was carried out speculatively on leases from major landowners, following a consistent form which has given rise to the formal grid pattern and terraced houses with landscaped squares.
- 5.4. Over the Victorian period and into the 20th

century, new uses emerged including first an increase in industrial and commercial uses and later the expansion of hospital, academic and cultural uses.

- 5.5. At paragraph 3.8, it defines the quintessential character as being derived from the grid of streets enclosed by mainly three and four storey developments giving the area an urban character, punctuated by formal squares which create focal points. These streets have a hierarchy, matched by the scale of the built form.
- 5.6. The appraisal divides the area into a series of sub-areas, of which the site forms part of Sub-Area 6: Bloomsbury Square/Russell Square/Tavistock Square.
- 5.7. This sub-area is characterised by 18th and 19th century terraces, but with pockets of later scale and urban grain 20th century redevelopment which is particularly noticeable around Tavistock Square, Bedford Way and Upper Woburn Place.
- 5.8. Of Upper Woburn Place, the conservation area appraisal makes the following comments:

5.100 The eastern side of Tavistock Square continues north along upper Woburn Place. Along both sides of Upper Woburn Place and to the north, east and south sides of Tavistock Square, 20th century buildings replaced earlier four-storey terraces. There is a strong consistency in the scale and massing of the buildings and the use of red brick with a contrasting stone or stucco base and minimal banding. Window openings are mostly vertically-proportioned. Many properties have mansard roofs above their parapet line with small dormer windows.

5.101 Central House and the New Ambassadors Hotel, to the south of St Pancras Church, which are of five and six storeys respectively, have a consistent parapet line and

similar massing and materials. Both contribute to the character of the street, although the New Ambassadors Hotel has some prominent plant that detracts from the roofscape. The County Hotel by C Lovett Gill (opened in 1940), immediately to the south and adjacent to the British Medical Association, steps up to eight storeys and has a greater bulk. On the west side of Upper Woburn Place is the grade II listed London Hilton Euston Hotel, a survival of the original early 19th century terraces. This building is of four storeys, but is of a smaller scale, four storeys in height and relates to the scale of development along the south side of Endsleigh Gardens. It is built in yellow stock brick with a stucco base and decorative stucco pilasters and banding and has frontage railings around the front basement area. To the south, Endsleigh Court is a 1930s neo-classical design by Sir Albert Richardsdon, which represents a significant step up in height to eight and nine storeys exposing its plain brick gable. This building forms a group with similarly scaled blocks on the opposite side of the street which provide a significant degree of enclosure to this end of Upper Woburn Place.

Contribution made by the site

- 5.9. The site is not identified on the townscape appraisal analysis as a positive contributor, but is listed at Appendix 3 as both an element of streetscape interest and a positive contributor to the conservation area.
- 5.10. The building forms part of the 20th century phase of redevelopment that saw the replacement in some areas of the historic terraces with buildings of greater scale and footprint. These accommodated the general trend of new and expanded uses within the conservation area, in this case the growth in hotel use as part of a cluster in this area north of Tavistock Square. In this sense, it does not form part of the 18th and 19th planned development that lies at the core of the conservation area's

¹ Historic England, 'Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2' (2015) p. 2.

special architectural and historic interest, but is aligned with its continued evolution and 20th century trends.

- 5.11. The building itself is not subject to any statutory or local designation such that relative to its designated neighbours, it makes a lesser contribution to the interest of the conservation area.
- 5.12. It is nevertheless a respectful building that sits comfortably within its 20th century evolved townscape context on Upper Woburn Place. In its scale and massing, the building sits comfortably within the townscape context of this part of Upper Woburn Place which is characterised by larger, urban scale buildings. Its materials palette also reflects the neighbouring buildings, as does its use of Classical detailing.
- 5.13. The main elevation fronts Upper Woburn Place. It is a symmetrical facade of 11 bays in red brick and stone. The ground and first floor are in stone which extends to a central 7-bay panel extending upwards from second to fourth floor. This is enriched with stone pilasters and cornice. A stone band runs across the building at attic level, with the attic level windows dressed in stone and sitting beneath an overhanging eaves. The detailing is Classically influenced and forms part of a cluster of Classically detailed 20th century buildings, including most prominently the neighbouring British Medical Association building.
- 5.14. It has a regular arrangement of matching 6/6 sash windows from first floor upwards to the attic level. The glazing bars are arranged with slimmer margin lights on a horizontal and vertical plane. The attic floor windows are wider casements.
- 5.15. The front section of the side return is plainer but continues the same materials palette. The rear elevations fronting Woburn Walk are not however of the same quality, using a plain



Fig. 7. County Hotel, Upper Woburn Place

brick with none of the stone embellishment and a mix of 1/1 sash windows and casements. It very much has the character of a secondary elevation despite fronting onto Woburn Walk with its collection of fine 18th century shop fronts.

- 5.16. The contribution made to the character and appearance of the conservation area is therefore

concentrated in the principal elevation fronting Upper Woburn Place, with potential for enhancement on its side elevations fronting Woburn Walk.

British Medical Association (Grade II)

- 5.17. The British Medical Association (BMA) building is a large multi-phase building with phases by Sr Edwin Lutyens. It is a steel frame construction with red brick elevations, Portland stone dressings, slate roof and timber sash windows. Its heritage significance is chiefly derived from its architectural and artistic interest as a fine example of Lutyens' earlier work in the neo-classical style, with later well-detailed additions by Wontner-Smith and Wood, together with its historic interest as the headquarters of the BMA since 1925.
- 5.18. The elevation fronting Tavistock Square to the south of the site forms part of the later phases. It is in red brick with stone dressings with Classical detailing. The site is broadly contemporary with the adjoining pavilion. The hotel is plainer in its detailing but complementary in its general scale and massing, use of materials and continuation of the Classically influenced detailing.



Fig. 8. BMA with the County Hotel extreme left

Woburn Walk (Grade II*)

5.19. Nos. 1-9 and Nos. 4-18 are a terrace of shops with accommodation at the upper floor levels. They were built in the early 19th century by Thomas Cubitt who was instrumental in the development of the Bedford Estate north and east from Russell Square. Their heritage significance is primarily derived from their architectural and historic interest as a high quality surviving group of shopfronts and association with Cubitt.

5.20. The flank elevation of the County Hotel forms part of the townscape along the narrow and intimate passage known as Woburn Walk. The rear elevation of the hotel is not of the same quality as the front elevation, compounded by its tired and dilapidated appearance. It does not contribute positively to an experience of the highly graded heritage assets along Woburn Walk.



Fig. 9. Woburn Walk



Fig. 10. County Hotel as seen from Woburn Walk

Hilton Hotel (Grade II)

- 5.21. The Hilton Hotel was formerly a terrace of five houses built in the 1820s by Cubitt. It is four storeys in stock brick with stucco ground floor and Classical detailing including a central bay with Corinthian columns flanked by bays decorated with pilasters. It is primarily of heritagesignificancebyvirtueofitsarchitectural and historic interest as a fine example of late Georgian architecture and forming part of the speculative growth of Bloomsbury by Cubitt, one of the master builders of the area.

- 5.22. The site is of a different phase and materials palette to the listed terrace, but sits comfortably within the surrounding 20th century townscape which includes Endsleigh Court to the immediate south of the listed building.



Fig. 11. Hilton Hotel (right hand side) with Endsleigh Court

6.0 Heritage Impact Assessment

Proposed Development

6.1. This application seeks to upgrade the external building envelope including full window replacement, external wall repairs and roof upgrade works. The description of development reads as follows:

The replacement of windows across all elevations, and replacement roof plant and associated works

Windows

6.2. The existing windows are tired and dilapidated having suffered from lack of maintenance over a number of years. More fundamentally, they do not deliver the thermal or acoustic performance required to meet the hotel operator's needs, driven by consumer market expectations.

6.3. The existing single-glazed timber windows are proposed to be replaced with slim profile double-glazed timber windows in a like-for-like style that replicates the existing pattern of glazing bars across the sashes and casements. All windows are proposed for replacement to retain uniformity across the fenestration.

6.4. The windows will be manufactured with trickle vents and acoustic attenuators positioned on the uppermost part of the frame. These are required to deliver the ventilation strategy whilst mitigating the noise impacts from the site's location on the busy Upper Woburn Place with its high levels of traffic.

Other works

6.5. Other works do not necessarily require planning permission but are included here for completeness. They include:

- Removal of faulty roof coverings and replacement with a high-performance

roof system.

- Removal of unsightly key-clamp edge protection railing and replacement with roof-mounted fall restraint system.
- Removal of all redundant plant and pipework.
- Replacement roof top plant.
- Removal of fragile rooflights.
- Removal of redundant access stairs and platforms.
- Rainwater goods repair and replacement works as required, on a like-for-like basis, including cleaning out of all gutters and downpipes.
- General repair and cleaning of masonry as required, including removal of plant growths.
- Removal of redundant ductwork and flues as required, together with repairs to walls where fixings have been removed.
- Removal of broken windows and doors to the Plant Room enclosure, together with repairs and re-rendering.

Heritage Impact Assessment

- 6.6. These works form part of a wider refurbishment programme for the County Hotel which has been suffering from a lack of maintenance and investment. The purpose of these works is to enhance and upgrade the quality of the internal accommodation as well as the external appearance of the building.
- 6.7. The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) identifies that the character of the Bloomsbury Conservation Area is vulnerable to negative change through

the deterioration of built fabric arising from neglect and a lack of maintenance (paragraph 5.9). This is highlighted as being particularly acute in areas dominated by hotels, student accommodation and hostels. The aims and objectives of this refurbishment project therefore align directly with the positive management of the distinctive character of the conservation area.

6.8. A key aspiration of the refurbishment is also to improve energy efficiency. The Council's Supplementary Planning Document 'Energy efficiency and adaptation' (2021) makes clear that the Council supports sensitive development which improves the energy efficiency of existing buildings, with all buildings being refurbished expected to reduce their carbon emissions by making improvements (paragraph 8.3).

6.9. Paragraph 8.6 deals directly with windows. It guides that if windows are being replaced, thermally efficient glazed windows will provide more effective insulation than older windows. The introduction of thermally efficient double-glazing will deliver an overall carbon reduction as set out in the accompanying statement by Elkoms. This is directly in accordance with the Council's supplementary planning document.

Windows

6.10. The building is c1940 and not therefore of an age where the joinery itself is of any particular historic significance. Whilst a positive building within the conservation area, it is not itself considered to be a building of historic interest. Nor is the building listed or a non-designated heritage asset. In principle, the removal of the windows subject to an appropriate replacement can be achieved whilst sustaining the character and appearance of the conservation area.

6.11. The replacement windows have been carefully designed to replicate the appearance of the existing with matching glazing bar patterns

across the sash and casement windows.

- 6.12. A slim-profile double-glazed unit has been selected to minimise the visual change of the addition of spacer bars. The slim-profile will minimise the perceptibility of the spacer bars which follow the pattern of the glazing bars thereby maintaining the appearance of the structural glazing bars.
- 6.13. Notwithstanding the above, this is a 1940s building executed in a clearly 20th century architectural style. It is not of the same sensitivity to the introduction of double-glazing as its 19th century and earlier counterparts.
- 6.14. The trickle vents are discreetly located at the head of the window with the attenuator well concealed within the depth of the window reveal. Careful consideration has been given to the size of the attenuator to minimise visual impact whilst still achieving acceptable noise levels. The size now proposed will have affect minimal change to the appearance of the windows, and will be applied across all windows such that uniformity will be maintained.
- 6.15. Importantly, all windows are to be replaced, thereby ensuring a consistent appearance across the elevations. This is considered important given the large number of repeating windows and the symmetrical, formal composition of the building in the Classical tradition.
- 6.16. The windows will be replaced in timber thereby sustaining a traditional materials palette in keeping with more historic joinery throughout the conservation area.
- 6.17. In summary, the proposed change to the appearance of the elevations will be very minor. The elevations are robust and the replacement units will deliver overall enhancement by replacing dilapidated windows with high quality timber replacements designed to replicate the appearance of the existing.



Fig. 12. Mock-up sash window, front elevation. (Please note this does not feature the proposed acoustic attenuator. This is shown on drawing AA(31)001.)

Changes from the existing units are required to deliver upgrades to the thermal and acoustic performance of the building that will enhance the building's economic and environmental sustainability, thereby supporting its ongoing

use. These changes are very minor and not considered to materially adversely impact the contribution that the building makes to the character and appearance of the conservation area or significance of nearby listed buildings.

6.18. This has been demonstrated by mock-up units which have been installed to test the visual impacts of the proposed replacement units. These demonstrate that the changes will be minimally perceptible and will overall not impact the appearance of the building.

6.19. Permission was granted for the replacement of the existing windows with double-glazed windows to Endsleigh Court, opposite the site (ref. 2017/4663/P). The decision notice includes an informative stating:

The proposed windows sit in the existing openings and match the existing form of casement openings and general fenestration. As such the replacement is not considered to be detrimental to the character of the building or that of the wider conservation area.

6.20. These same conclusions can be drawn with the proposed scheme to the County Hotel, demonstrating no impact on the conservation area or setting of adjacent heritage assets.

Other works

6.21. The other proposed works to the building will de-clutter areas where services have proliferated and are now redundant, and repair/replace dilapidated services. These works will deliver clear enhancement.

6.22. The replacement roof top plant has been carefully sited so as not to be visible within the streetscene. The plant is set back from the Upper Woburn Place elevation such that it is not anticipated to be visible in longer views along the street from street level. Sight lines demonstrate it will not be visible at close range from opposite the building on Upper Woburn Place. It is also not anticipated to be visible in longer views from Woburn Walk/Duke's Road, and sight lines have been provided showing it not to be visible from immediately opposite on Woburn Walk.

7.0 Conclusions

- 7.1. The County Hotel is a 20th century structure not subject to any individual heritage designation but identified as a positive contributor to the Bloomsbury Conservation Area. It is located within a sensitive townscape with adjacent Grade II and Grade II* listed buildings.
- 7.2. Care has been taken to balance energy efficiency and acoustic upgrades whilst maintaining the overall appearance of the building and its contribution to the character and appearance of the conservation area and setting of adjacent heritage assets.
- 7.3. The proposals are considered to be entirely in accordance with Local Plan Policy D2, London Plan Policy HC1 and the objectives of Chapter 16 of the NPPF, and the duties at sections 66 and 72 of the 1990 Act can be satisfactorily discharged.