

184 &188 North Gower Street  
London NW1

**LISTED BUILDING ASSESSMENT**

16 NOVEMBER 2023

GJHP

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# 1 INTRODUCTION

- 1.1 This Listed Building Assessment has been prepared by GJHP in support of the listed building consent applications to regularise works undertaken at nos. 184 and 188 North Gower Street, in Somers Town, in the London Borough of Camden. GJHP is a consultancy that provides expert advice on heritage matters.
- 1.2 The assessment sets out the following:
- Relevant statutory duties and national and local policy and guidance;
  - A statement of significance of the grade II Listed nos. 184 and 188 North Gower Street;
  - An assessment of the effect of the works that have taken place on the significance of the listed buildings.
- 1.3 A site visit was undertaken on the 17 October 2023 on which it was only possible to access no. 184. We have seen photographs of no. 188 taken later in October 2023 by the planning consultants Savills and these are used in this report.
- 1.4 This report should be read in conjunction with the covering letter prepared by Savills.
- 1.5 GJHP were appointed in October 2023 and were not involved at the time the works (which are the subject of this application) were undertaken.

## 2 LEGISLATION, POLICY & GUIDANCE

- 2.1 This section contains an overview of the relevant statutory duties and national, London-wide and local planning policies and guidance that are relevant to the consideration of heritage matters.

### **Statutory Duties**

#### ***The Planning (Listed Buildings and Conservation Areas) Act 1990 (the 'Act')***

##### *Listed buildings*

- 2.2 Section 7 of the Act notes that not all works require listed building consent, only demolition or works of alteration or extension that affect the character of the building as a building of special architectural or historic interest.
- 2.3 Section 9 of the Act states it is an offence to carry out works that require listed building consent without such a consent being obtained.
- 2.4 Section 66 (1) of the Act states, '*in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*'

### **National planning policy and guidance**

#### ***The National Planning Policy Framework, 2023***

- 2.5 The Government issued the National Planning Policy Framework (NPPF) in September 2023. The NPPF sets out planning policies for England and how these are expected to be applied.
- 2.6 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three dimensions; economic, social and environmental. The NPPF states, at paragraph 10, that '*at the heart of the Framework is a presumption in favour of sustainable development.*'

*NPPF Section 16: Conserving and enhancing the historic environment*

- 2.7 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.
- 2.8 Heritage assets are defined in Annex 2 of the NPPF as a *'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*
- 2.9 The NPPF notes, at paragraph 184, that heritage assets *'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'*
- 2.10 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 189). It goes on to say that *'the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*
- 2.11 The NPPF identifies three key factors local authorities should take into account in determining applications:
- '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 including their economic vitality; and*  
*The desirability of new development making a positive contribution to local character and distinctiveness.'*
- 2.12 Paragraph 193 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 2.13 The NPPF states, at paragraph 195, that where a proposed development would lead to *'substantial harm'* or total loss of heritage significance of a designated heritage asset, consent should be refused, *'...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 a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.

- 2.14 Where a development proposal will lead to *'less than substantial'* harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 196).

## **Regional planning policy and guidance**

### ***The London Plan 2021***

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

## **Local policy and guidance**

### ***The Camden Local Plan (2017)***

- 2.17 The Camden Local Plan was adopted on 3rd July 2017. It replaced the Core Strategy and the Development Policies. It covers the period up until 2031 and aims to help the delivery of the Council's vision for Camden.
- 2.18 **Policy D2 Heritage** states 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. The policy is in line with the NPPF in respect of assessing harm to designated and non designated heritage assets.
- 2.19 In respect of listed buildings, part K states that the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting.

## **Supplementary planning documents, guidance and other**

### ***Camden Planning Guidance – Design (2021)***

- 2.20 The Camden Planning Guidance on Design was published in January 2021 and supports the local plan. It gives information on detailed design issues, including design excellence and heritage, and supports policy D2 (amongst others) in the Camden Local Plan.
- 2.21 In respect of alterations to listed buildings it notes that the Council will consider the impact of proposals on the historic significance of a building, including its features, such as:
- original and historic materials and architectural features;
  - original layout of rooms;
  - structural integrity; and
  - character and appearance.
- 2.22 It goes on to say that the Council will expect original or historic features to be retained and repairs to be in matching material. Proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them.

### **Other guidance**

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

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

***Historic England Advice Note 12: Statements of Heritage Significance:  
Analysing Significance in Heritage assets (October 2019)***

- 2.25 The purpose of this note is to provide guidance on analysing the significance of heritage assets. It elaborates on the policy, guidance and advice set out in the NPPF and national PPG. It suggests a staged approach to assessing the effect of proposals on heritage significance which would usually include:

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

*2. Understand the significance of the asset(s)*

*These two stages fulfil the requirement in paragraph 189 of the NPPF and are undertaken by the applicant.*

*3. Understand the impact of the proposal on that significance*

*This stage fulfils the requirement in paragraph 190 of the NPPF and is undertaken by the LPA. However, the applicant needs to be aware of impacts so that the analysis of significance submitted to the LPA, under paragraph 189, is sufficient in its level of detail.*

*4. Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF*

*5. Look for opportunities to better reveal or enhance significance’.*



### 3 THE SITE AND ITS HERITAGE SIGNIFICANCE

#### Location

- 3.1 North Gower Street runs from Euston Road to the south to George Mews and Starcross Street to the north-west. Nos. 184 and 188 lie on the north-east side of the street between Drummond Street and Euston Street.

#### The Sites

- 3.2 No. 184 and no. 188 form part of the grade II listed terrace nos. 184 to 188. The applications relate to works that have taken place at ground floor level in flat 1 at no. 184 and flat 1 at no. 188. Both flats comprise the ground and basement levels of the respective terraced houses.



- 3.3 Nos. 184 to 188 North Gower Street were listed grade II on the 14 May 1974. The list description reads as follows:

*'3 terraced houses. C19 earlier. Yellow stock brick with rusticated stucco ground floors and plain 1st floor band. 4 storeys and basement. 2 windows each. Round-arched ground floor openings. Doorways with fanlights and Nos 184 and 186 with fluted 1/4 columns carrying cornice-heads. Gauged brick flat arches to recessed sash windows with glazing bars. Cast-iron balconies to 1st floor windows. Parapet. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with torch flambe finials.'*

- 3.4 The list description does not include any information on the interiors of the terraced houses.
- 3.5 The list description notes the terraced houses are of group value.
- 3.6 Application ref. no: 2012/4465/L for works to nos. 184 to 188 North Gower Street was approved on 25 September 2012. The works comprised the *'Repair, alteration and cleaning of exterior of building, including the replacement of waterproof membrane to balconies, installation of draught strips to existing sash windows, and installation of a damp proof membrane to front lower ground level and rear courtyard area'* and enhanced the appearance of the street facades of the terrace.

### **Significance**

- 3.7 The National Planning Policy Framework defines heritage significance at *'Annex 2: Glossary'* as:

*'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'*

- 3.8 The statement of significance below, in line with PPG paragraph: 006, considers the various heritage interests of the relevant heritage assets as follows:

***'Archaeological interest*** *There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

***Architectural and artistic interest*** *These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*

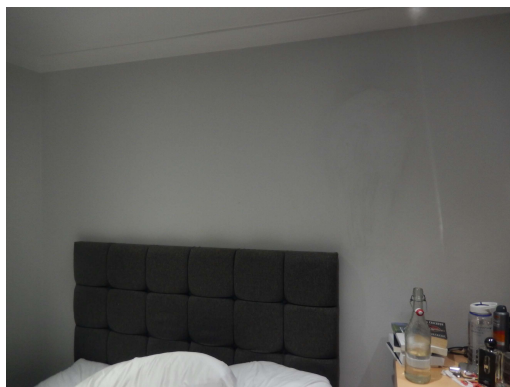
***Historic Interest*** *An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.'*

- 3.9 In legislation and designation criteria, the term '*special architectural and historic interest*' is used to describe the heritage significance of a listed building.

#### **Nos. 184 & 188 North Gower Street**

- 3.10 Each house is of significance as forming part of a wider terrace and it's the principal street elevation that contributes most to the significance of the terrace. Each terraced house is well maintained and the three retain a uniform appearance. They have been extended to varying degrees at ground floor and basement levels to the rear.
- 3.11 The terraced houses have each been converted into 3 flats. The flats the subject of the applications, at nos. 184 and 188, each occupy the ground and basement levels.
- 3.12 For the purposes of these applications, we have only been into the two flats where the works have been undertaken. Both flats have been refurbished internally with new bathrooms and kitchens and there have been various changes to plan form, including through the extensions to the rear, and in part to incorporate bathrooms and encase the staircase. Cornices and skirtings survive in places (some of these appear to be reproduction) and the doors and architraves are modern.
- 3.13 The works which have been undertaken (which are the same in both flats) are minor in nature and relate to the ground floor only. They involve the infilling of an opening (believed to be later and not original, as discussed below) in the spine wall between the front and rear rooms in the main house within each flat. The photographs below show the spine walls following the works.
- 3.14 The cornices can be seen in situ in the 4 rooms effected. In flat 1 at no. 184 the works have resulted in a seamless finish to the infilled spine wall. The modern architrave of the infilled opening remains on show in both rooms in flat 1 at no. 188.

#### ***Flat 1, no. 184***



Spine wall - front ground floor room



Spine wall - rear ground floor room

***Flat 1, no. 188***



Spine wall - front ground floor room



Spine wall - rear ground floor room

***Setting***

- 3.15 These three terraced houses are of group value with the Crown and Anchor Public House (no. 137 Drummond Street). Nos. 168 & 179 and 200 to 204 (even) North Gower Street are also listed grade II.

## 4 PROPOSALS, ASSESSEMENT AND CONCLUSIONS

- 4.1 This section sets out the works that have taken place, assess their effect on the significance of the listed buildings and sets out our conclusions in respect of the two listed building consent applications.

### **Proposals**

- 4.2 These applications seek to regularise works that have been undertaken by previous tenants at the two flats without the knowledge of the freeholder. The works are believed to have occurred sometime between 2014 and 2020.
- 4.3 The works involve the infilling of a modern opening in the spine wall between the front and rear room at ground floor level of flat 1 no. 184 and flat 1 no. 188. That to no. 184 has been done seamlessly so that no trace of the opening remains and it is not known how the opening appeared prior to the works. That to no. 188 has involved the infilling of the opening retaining the modern architrave surround.

### **Assessment and conclusions**

- 4.4 It is unfortunate these works have been undertaken without the benefit of listed building consent, but they are considered to be minor in nature and not to have harmed the significance of the listed buildings. It is reasonable to assume that no historic fabric has been lost given the work simply involved the infilling of an opening in the respective spine walls.
- 4.5 It is believed these openings were a later alteration to the houses which typically would have had separate rooms to the front and rear. The modern frame and proportions of the opening at no. 188 remains visible.
- 4.6 The principal significance of this terrace lies in the street elevations and in it forming part of a wider sequence of Georgian terraced houses locally. The individual properties are no longer in use as town houses and whilst the interiors are also of significance, they have undergone successive phases of changes having been converted into flats.
- 4.7 These applications seek to regularise the situation as it is considered that listed building consent would have been granted for the works had applications been made. The need for further interventions to the listed buildings to rectify these works would not benefit the listed buildings, and the current arrangement enhances the accommodation within each flat.

- 4.8 In conclusion, the works are considered to have had regard to the special architectural and historic interest of these altered listed buildings as found today and to comply with the requirements of the Act. They are in line with the guidance set out in NPPG, national PPG and local policies and guidance.

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