



Mr Daren Zuk
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Direct Dial: 020 7973 3721

Our ref: L01571726

14 February 2024

Dear Mr Zuk

Arrangements for Handling Heritage Applications Direction 2021

13-15 BONNY STREET LONDON NW1 9PE
Application No. 2024/0053/L

Thank you for your letter of 25 January 2024 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

13-15 Bonny Street is a well-preserved surviving example of mid-Victorian Railway architecture designed for the North London Railway by E H Horne as part of Camden Road station

The proposals would cause some harm to the significance of the buildings, through the loss of both staircases and original interior detailing. This harm would be contrary to the objectives of both the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework.

Historic England considers changes could be made to the proposed floor layouts and a repair strategy could be adopted which would minimise this harm.

Significance

13-15 Bonny Street is a well-preserved surviving example of mid-Victorian Railway architecture designed for the North London Railway by E H Horne as part of Camden Road station. The site consists of two, 19th-century terraced houses that back onto the Camden Road station's viaduct. They were possibly in use as residential houses before the rest of the station was completed but likely later used as ancillary buildings for the station to house offices and waiting rooms above good stores.

Internally, many of the original fixtures and fittings have been removed, however, they



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retain some features of interest including original (or early) plan form, chimney breasts, original mouldings and cornices and two original staircases.

The staircases are a key defining feature of the building's plan form that reflects its typology, domestic function, and period. They give us an understanding of the historic design of the house, and of how the buildings operated in the mid-late nineteenth century. They are therefore important to the historic and aesthetic significance of the building.

The buildings are listed Grade II as part of the Camden Road Station complex in recognition of their historic and architectural significance.

Both buildings are currently vacant and in a poor condition.

The proposals and their impact

The application concerns the ground and first floor of both buildings. The second floors are in separate ownership and not part of this application.

The proposals include the refurbishment and reconfiguration of the buildings in association with their change of use into one 2 bedroom dwelling at number 13, and a 3 bedroom dwelling at number 15.

This would result in the demolition of a substantial amount of the interiors of both buildings, including historic detailing including mouldings, skirting boards and architraves, and both staircases.

In our view, this would cause harm to the significance of the building, by removing an original part of the building's phase and plan form, and characterful original elements of the interior detailing.

Policy

The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local authorities to have special regard for preserving listed buildings (section 66). Guidance on how to fulfil duties relating to heritage assets is set out in the National Planning Policy Framework 2023 (the NPPF).

The NPPF sets out the Government's policies for decision-making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

Paragraph 201 instructs local planning authorities to identify and assess the particular



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significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.

Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or development within its setting), should require clear and convincing justification.

Paragraph 208 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Position

Historic England supports the aims of this project, which would see the refurbishment and upgrade of 13 and 15 Bonny Street, bringing them back into long-term use. We have no objection in principle to the change of use to residential dwellings.

However, the demolition of the staircases and internal detailing raises some concerns from Historic England. As detailed above, the removal of the staircases would cause some harm to the significance of this Grade II listed building. In the terminology of the Framework, that harm would be less than substantial.

Overall, the objective of the Framework should be to avoid harm. Therefore, those elements of the building that contribute to significance should be retained unless there is a clear and convincing justification for their removal.

We consider that it would be possible to avoid or at least reduce the harm identified while still achieving the main objectives of the project, under para 201 of the NPPF.

We think the following steps would be helpful as the proposals are developed:

- Understand the conservation needs of the building through undertaking a condition survey. This should provide a detailed schedule of repair and proposed works to allow for an understanding of the strategy and methodology adopted for preserving any surviving fabric of merit.



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- In response to the above, explore the repair of original decorative elements such as cornices and skirting boards to avoid the need for total replacement.
- Explore alternative dwelling layouts which would retain and repair both of the staircases.

Recommendation

Your Authority should take these representations into account and determine the application following national and local planning policy and in consultation with your specialist conservation advice.

In determining this application, you should be confident that the proposals are clearly and convincingly justified as that which would minimise the harm resulting from the loss and replacement of the staircases, and that any harm is resolved in the planning balance.

We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you unless the Secretary of State directs the application to be referred to them.

Yours sincerely

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