

10-11 AND 53-54 DOUGHTY STREET

Heritage Appeal Statement

JCH02026
Doughty Street
August 2023

EXECUTIVE SUMMARY

- This Heritage Appeal Statement has been prepared by Jennifer Cooke and Elizabeth Da Silva of RPS, part of Tetra Tech, to assess the potential impact on the significance of 10-11 Doughty Street and 53-54 Doughty Street, arising from the proposed installation of Guldmann Stepless' SLP model D lifts to allow independent access to the buildings for all clients and staff. This would entail alterations to the existing front entrance steps and walkway from public pavement to the entrance threshold, to allow ease of access to the ground floor hall and the meeting rooms and offices within. There is no intention to carry out any other visual or physical alterations to either the front elevation or the railings.
- Listed Building Consent Applications (2022/4667/L and 2022/4669/L) and Planning Applications (2022.3756/P and 2022/3757/P) relating to these works were both refused under delegated powers on 7 March 2023 by Camden Council for the same reason, that is that the proposed works would have a detrimental impact on the character and appearance of the Grade II listed 10-11 Doughty Street, the Grade II listed 53-54 Doughty Street and the Bloomsbury Conservation Area.
- This Heritage Appeal Statement supports the subsequent appeal of the Council's decision to refuse the applications and identifies the significance of 10-11 Doughty Street, 53-54 Doughty Street and the Bloomsbury Conservation Area. It demonstrates that:
 - i. The Appeal Scheme would have a negligible impact, resulting in the lowest level of less than substantial harm to the significance of the listed buildings.
 - ii.) The Appeal Scheme proposes a high-quality design solution which would safeguard the appearance of 10-11 Doughty Street, 53-54 Doughty Street and the Bloomsbury Conservation Area.
- This Appeal Statement also highlights the relevant legislation and policy documents which advocate making a listed building's main entrance accessible for all - Historic England's Guidance Note: Easy Access to Historic Buildings (June 2015), Camden's Council's own planning policy (Policy C6, Access for All, 2017) and planning guidance (Access for All, March 2019), with the latter stating that a sensitive design solution facilitating dignified and easy access to and within listed buildings should be sought.
- A similar application at 6-7 Bedford Row W1CR (Ref 2019/1573/P and 2019/2175/L and APP/X5210/Y/20/3246427) proposing the part removal of existing entrance steps to facilitate the installation of a new vertical rising stair/ platform lift to allow for ambulant disabled/ wheelchair access into the premises was allowed at appeal on 22nd December 2020. The Planning Officer's Delegated Report for 10-11 and 53-54 Doughty Street states that a fundamental and material difference exists in the circumstances of the appeal case as the proposal would cause harm in order to facilitate entry into a premises with what appears to be extremely limited internal access for disabled persons - we disagree with this statement.
- As described in this Statement, and contrary to the Planning Officer's Delegated Report, the internal layout of the appeal site is already utilised effectively by disabled persons. A ramp, lift, wide doorways and circulation spaces, accessible kitchen and bathroom facilities, a vertical lift and automatic doors all facilitate existing wheelchair access. In fact, the only restrictions on wheelchair access and thus the only required changes relate to the entrance to the Appeal Site. There is no access to the buildings from the rear and currently temporary ramps are placed over the steps at the front. However, this relies on staff being available to set-up and remove them. Exiting also requires a wheelchair user to make a backwards manoeuvre into the street. This restricts access and is potentially dangerous in emergency situations. This does not promote direct access to the building for all, nor is it in line with the aspiration in Section 6 of the Council's CPG – Access for All (March 2019) which makes specific reference to

'Measures to facilitate dignified and easy access to and within listed buildings...' The appeal scheme seeks to provide an equivalent level of access for all externally, as is currently provided internally.

- As Camden Council believe that there is limited internal access for disabled persons, they have not correctly weighed the public benefits of the appeal scheme, as prescribed in paragraph 202 of the National Planning Policy Framework (July 2021), against the lowest level of less than substantial harm that this Statement has found that the proposals would incur. Given the nature of the current use of 10-11 Doughty Street and 53-54 Doughty Street and the current and ongoing regular accessible external access requirements, making them more accessible would secure the retention of the optimum viable use of the heritage assets. There would be minimal impact to historic fabric and to the overall significance of the listed building.
- With no alternative accessible entrance available, the appeal scheme presents a reasonable and proportionate approach to the owner's needs which would also conserve the use of the building (as per Historic England's Advice Note 2: Making Changes to Heritage Assets, February 2016) and outweigh the lowest level of less than substantial harm to the significance of both 10-11 Doughty Street and 53-54 Doughty Street.
- In comparison to the scale of the Bloomsbury Conservation Area and the fact that variability is evident in the extant entrances of the buildings and terraces on Doughty Street, the appeal scheme would cause no harm to the significance of the Bloomsbury Conservation Area.

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1 INTRODUCTION

1.1 This Heritage Appeal Statement has been prepared by RPS, part of Tetra Tech, on behalf of Mr Terrance Munduru, Doughty Street Chambers ('the Appellant') in respect of a Listed Building Consent Appeal under section 20 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 and a Planning Application Appeal under the Town and County Planning Act 1990 ('the Appeal'). This Statement has been written by Jennifer Cooke BA (Hons), MA, IHBC and Elizabeth Da Silva BA (Hons).

1.2 The Appeal is made against the London Borough of Camden's ('the Council') refusal of Listed Building Consent and Planning applications for the part removal of existing entrance steps to facilitate the installation of new vertical stairs/platform lifts for step-free access, together with associated internal machine cabinets and controls ('the Appeal Scheme') at 10 Doughty Street and 54 Doughty Street. Although the proposals are located at the entrances of Nos. 10 and 54 Doughty Street respectively, the 'Appeal Site' consists of 10-11 and 53-54 Doughty Street; both buildings are conjoined.

1.3 The Listed Building Consent Applications (2022/4667/L and 2022/4669/L) and Planning Permission Applications (2022.3756/P and 2022/3757/P) were both refused under delegated powers on 7 March 2023 with the same Reason for Refusal for both properties:

1. *The proposed works, by virtue of the detailed design and loss of historic fabric, combined with the prominent position of the entrance steps, would have a detrimental impact on the character and appearance of the host building which is Grade II listed, and the Bloomsbury Conservation Area, contrary to Policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.*

1.4 Section 5 of this Statement addresses the significance of both the Appeal Site and the Bloomsbury Conservation Area.

1.5 The following documents were submitted and made up the original applications:

10-11 Doughty Street

- Application Form
- Design and Access Heritage statement Aug 2022
- DWG 5038 01 Existing ground floor plan
- DWG 5038 03 Existing basement floor plan
- DWG 5038 05 Existing front elevation
- DWG 5038 02 Proposed ground floor plan
- DWG 5038 `04 Proposed basement floor plan
- DWG 5038 06 Proposed front elevation
- Guldmann latest Drawing Set
- Example photos of proposed platform lift
- 10 Doughty Street – Front Access (image)

53-54 Doughty Street

- Application Form
- Design and Access Heritage Statement Aug 2022
- DWG 5401 01 Existing ground floor plan

- DWG 5401 03 Existing basement floor plan
- DWG 5401 02 Proposed ground floor plan
- DWG 5401 04 Proposed basement floor plan
- DWG 5401 06 Proposed front elevation
- Guldmann latest Drawing Set
- Example photos of proposed platform lift
- 54 Doughty Street – Front Access images
- Location and Block Plan (OS)

1.6 The Council's Reason for Refusal of the Appeal Scheme was based on the Planning Case Officer's Delegated Report dated 07/03/23. Although this Report took the significance of the listed buildings into account, it made a reference to the interiors of the properties which we disagree with as set out in more detail below:

"There is very limited circulation within all of the properties served by the proposed platform lift and the nature of the interiors means that provision of internal access is likely to be extremely difficult to achieve without causing an unacceptable degree of harm to fabric and planform. Therefore the Council cannot properly weigh the public benefit of the proposals beyond what is in front of us at the time of this application, which is that the proposal would cause harm in order to facilitate entry into a premises with what appears to be extremely limited internal access for disabled persons".

1.7 In relation to this a similar application at 6-7 Bedford Row W1CR (Ref 2019/1573/P and 2019/2175/L and APP/X5210/Y/20/3246427) proposing the part removal of existing entrance steps to facilitate the installation of a new vertical rising stair/ platform lift to allow for ambulant disabled/ wheelchair access into the premises was allowed at appeal on 22nd December 2020. The Planning Officer's Delegated Report stated that *"a fundamental and material difference exists in the circumstances of the appeal case and this application...(as the)...Inspector was in a position to balance the public benefit of the proposed lift together with "the alterations already undertaken." These alterations relate to the interior of the site and include extant disabled access across all floors. These extant alterations not only enabled the Inspector to consider the manner in which the proposed alterations would weigh into the public benefit of the site, but also was able to consider the manner in which the proposed alterations might then lead to the realisation of the optimum viable use of the site.*

1.8 As Camden Council believe that there is limited internal access for disabled persons, they did not correctly undertake the exercise of weighing any harm to the Appeal Site against the potential public benefits afforded by the proposed development and secure the buildings optimum viable use as required by paragraph 202 of the National Planning Policy Framework.

1.9 Section 4 of this Statement references the relevant policy documents including:

- Paragraph 202 of the National Planning Policy Framework (July 2021);
- Historic England's GPA2: Managing Significance in Decision-taking in the Historic Environment (March 2015);
- Historic England's Advice Note 2: Making Changes to Heritage Assets (February 2016);
- Historic England's Guidance Note: Easy Access to Historic Buildings (June 2015); and
- Camden Planning Guidance – Access to All (March 2019)

1.10 All of the above should have been taken into account in considering the proposed development as well as the public benefits afforded by the Appeal Scheme. The benefits are detailed in the Statement of Case. Notably the Council's own Planning Guidance – Access for All (March 2019) states that *"For listed buildings and other heritage assets, the Council will balance the requirement*

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to provide access with the interests of conservation and preservation. Sensitive design solutions that achieve access for all, to and within listed buildings, should be sought". Given the lack of opportunity to provide accessible access at the rear of both properties, the proposed Appeal Scheme is considered to provide such a sensitive design solution.

1.11 We also disagree with the Officer's Delegated Report where it states that "*The proposal, by virtue of its design, visual prominence and location, would create incongruous additions, out of keeping with the host buildings, and detrimental to the established character and appearance of the listed terraced buildings and wider Bloomsbury conservation area*".

1.12 We can state that:

- i.) The interiors of both these properties have circulation adapted to the access of disabled persons and are already effectively utilised by wheelchair users;
- ii.) No further works need to be undertaken to the interior of either property, that is no harm would be caused to fabric, plan form and therefore significance of these listed buildings;
- iii.) The proposed development design has been carefully considered, including the tiling, in order to be in keeping with both properties and the wider conservation area.

1.13 Historic England guidance contained in GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015) is clear that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
- Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

1.14 This Heritage Appeal Statement will provide:

- 1) A description of the Appeal Site;
- 2) An appraisal of the relevant heritage-related legislation, policy and guidance;
- 3) An assessment of the significance of the Appeal Site and the character of the Bloomsbury Conservation Area;
- 4) An assessment of the impact on this significance arising from the Appeal Scheme including all relevant design and mitigation measures; and
- 5) In accordance with paragraph 202 of the National Planning Policy Framework (2019) a description of how the Appeal Scheme allows for the current (and likely optimum) viable use of the building to be retained with minimal impact to historic fabric.

2 APPEAL SITE AND SURROUNDINGS

Description

- 2.1 The Appeal Site comprises Nos.10-11 and 53-54 Doughty Street and is located within the London Borough of Camden and the Bloomsbury Conservation Area.
- 2.2 Doughty Street is positioned to the north of High Holborn and south-east of Coram's Fields; the major route Gray's Inn runs north-south at a short distance to east. The street is a wide, grand and almost complete Georgian thoroughfare with terraces spanning the late eighteenth to early nineteenth century – at this latter time some of the corner plots were refaced so that the street junctions now provide greater architectural emphasis.
- 2.3 The mixture of three and four-storey townhouses along the street are constructed of yellow stock brick, with red brick trim on the earlier examples and stucco detail on the later designs; although they are proximate in plan form to the structures in Bedford Row, they are smaller in footprint and scale. A large number of buildings on this street are listed which reflects the high quality of the built environment. Office use generally dominates although a number of properties have been re-converted into single residential use.
- 2.4 The terraces evidence a variety in doorcase, fanlight and balcony design. In respect of entrances, these are extremely varied in design, width and access - some have two steps, some a single step and some have very low or step-free access.
- 2.5 The Appeal Site buildings form part of the north-south running terraces along Doughty Street. Nos-10-11 sit within a terrace that dates between 1799-1824 and is constructed of multi-coloured stock brick with yellow stock brick patching whilst Nos. 53-54 sits within a terrace dating from c1807-9 and of multi-coloured stock brick - most properties with evidence of tuck pointing. Both buildings are listed at Grade II and form parts of listings for the terraces at Doughty Street: 10-11 as part of *Numbers 1-19 and attached railings* and 53-54 as part of *Numbers 39-47 and 49-62 and attached railings*. The full listing citations are included at Appendix A.
- 2.6 The Officer's Delegated Report stated that planning history is 'non-relevant'. However, we would point out that both buildings at the Appeal Site have undergone alterations and additions; the most recent at 10-11 Doughty Street being in 2017 for "*Internal alterations including the demolition of non-original stud partition walls at ground floor level and strip out of modern ceiling and floor finishes and lighting*" (2017/3366/L) and in 2023 for the retrofitting of photovoltaic (solar) panels (2023/2213/L).
- 2.7 Nos. 53-54 Doughty Street have undergone substantial alterations since their original construction. By 1953 they were linked through openings within the party wall and in 1961 a single storey rear extension was added to the rear of no.54. The most recent internal alterations were granted listed building consent in 2017 (2017/3683/L) for "*Internal alterations including the installation of partition walls at basement level and within the modern extension to the rear at ground floor level; removal of false chimney breast and suspended ceilings at ground floor level; various other general repair and refurbishment works*" and in 2022 (2022/0725/L) for "*Installation of photovoltaic (solar) panels on main roof slopes, flat roof of four storey rear wing and south facing roof slope of single storey rear extension*".

Current Internal Circulation

- 2.8 There is already step-free circulation inside Nos 53-54 Doughty Street by means of a vertical lift that gives access to the basement. The existing doorways and circulation spaces are wide enough to accommodate wheelchair access and the modern extension to the rear is accessed via an existing ramp. There is already an accessible toilet on the ground floor and easy access to meeting room, conference room and kitchen facilities. All of which is evidenced in the photographs below.

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- 2.9 With regard to 10-11 Doughty Street, access to the upper floors is not required but the ground floor doorways and circulation spaces are already wide enough for wheelchair use. The relevant office and the accessible WC already has an automatic door (Image 2 and 8 below) providing existing wheelchair users ongoing access.



Image 1: Current Entrance to No.54 Doughty Street which is automatic and wide enough to accommodate a wheelchair



Image 2: Existing facilities on ground floor of No.54 Doughty Street

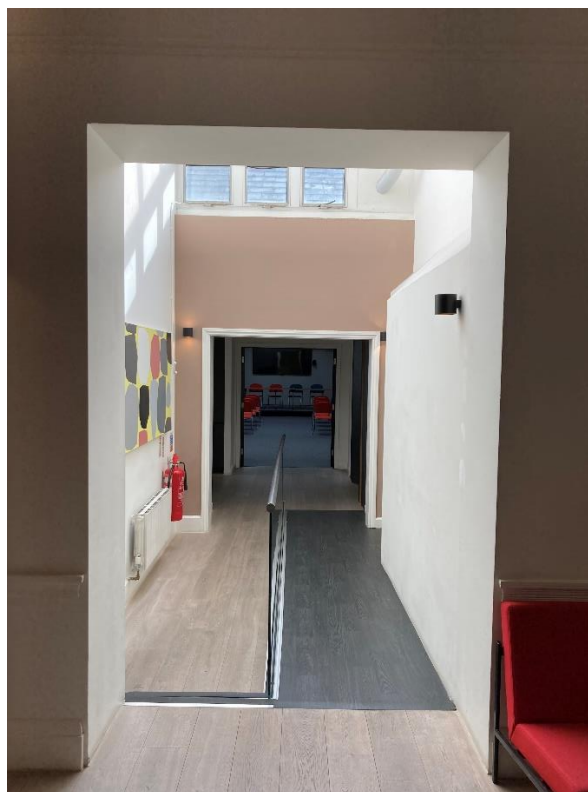


Image 3: Existing ramp to modern extension home to conference facilities on ground floor of No.54 Doughty Street



Image 4: Existing modern extension home to conference facilities on ground floor of No.54 Doughty Street



Image 5: Existing kitchen facilities on ground floor of No.54 Doughty Street accessible in a wheelchair



Image 6: Existing vertical lift ground floor of No.54 Doughty Street accessible in a wheelchair

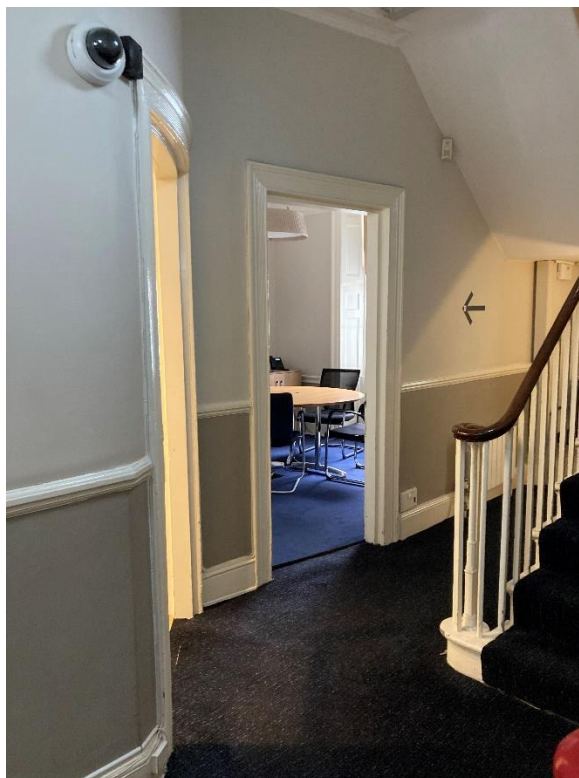


Image 7: Existing internal circulation space and access to meeting room and office on ground floor of No.10-11 Doughty Street accessible in a wheelchair



Image 8: Office on ground floor of No.10-11 Doughty Street which already has an automatic door and is thus accessible in a wheelchair

Current External Access Restrictions

- 2.10 In fact, contrary to the Council's Planning Officer's Delegated Report, the only restrictions on wheelchair access and thus the only required changes relate to the entrance to the Appeal Site. There is no access to the buildings from the rear and currently temporary ramps are placed over the steps at the front. However, this relies on staff being available to set-up and remove them. Exiting also requires a wheelchair user to make a backwards manoeuvre into the street. This restricts access and is potentially dangerous in emergency situations. This does not promote direct access to the building for all, nor is it in line with the aspiration in Section 6 of the Council's CPG – Access for All (March 2019) which makes specific reference to '*Measures to facilitate dignified and easy access to and within listed buildings...*'

Bloomsbury Conservation Area

- 2.11 The Appeal Site is within the Bloomsbury Conservation Area, which was designated in 1968. In April 2011 the Council adopted the Bloomsbury Conservation Area and Management Strategy (BCAMS), the purpose of which was to '*define the special interest of the Bloomsbury Conservation Area in order that it's key attributes are understood and can be protected, and that measures are put in place to ensure appropriate enhancement*'.
- 2.12 The Bloomsbury Conservation Area covers a large area of approximately 160 hectares that extends from Euston Road to north, High Holborn and Lincoln's Inn Fields to south, Tottenham Court Road to west and King's Cross Road to east. There are 14 Sub Areas within the conservation area.
- 2.13 The BCAMS states that "*Bloomsbury is noted for its formally planned arrangement of streets and the contrasting leafy squares. The urban morphology comprises a grid pattern of streets generally aligned running north-west to south-east and south-west to north-east, with subtle variations in the orientation of the grid pattern. The quintessential character of the Conservation Area derives from the grid of streets enclosed by mainly three and four-storey development which has a distinctly urban*

character of broad streets interspersed by formal squares which provide landscape dominated focal points.

2.14 The Appeal Site is located within Sub Area 10, Great James Street/Bedford Row which is described as being:

“...developed during the Georgian and Regency periods under various ownerships, although part of the street pattern was laid out earlier by Nicholas Barbon. The area has a clear street hierarchy structured on a grid layout. Bedford Row, Doughty Street and John Street are wide thoroughfares characterised by larger properties...Although the overall perception is one of homogeneity; there is subtle variation in the detailing of the terraces, often derived from the piecemeal nature of the building process. The strong uniformity in appearance is due to the consistency of materials. Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares (John Street, Doughty Street, Bedford Row, Rugby Street and Great James Street) are dominated by office uses but retain some residential uses (in particular in Millman Street)”.

2.15 Further information on the significance of the listed buildings and the Bloomsbury Conservation Area and the impact to this significance arising from the proposed development, in accordance with paragraph 194 of the NPPF, is provided at Section 5 of this Statement. In summary it is apparent that the listed buildings form part of listed terraces and their significance is derived from their architectural and historic interest as eighteenth/nineteenth-century dwellings constructed in the Georgian style.

3 THE PROPOSED DEVELOPMENT

- 3.1 The two application forms provide the following descriptions for the proposed development:
- 3.2 10 Doughty Street: *“To replace existing stepped access to number 10 Doughty Street with a platform lift to provide wheelchair access”.*
- 3.3 54 Doughty Street: *“To replace existing stepped access to number 54 Doughty Street with a platform lift to provide wheelchair access”.*
- 3.4 Access to the Appeal Site from the street is stepped which does not provide inclusive access. The current proposals advocate the Guldmann Stepless’ SLP model D lift in order to allow independent and inclusive access for all clients, staff and visitors. The lift design would be unique to the Appeal Site and comprises a simple scissor lift. The workings would sit in a concealed metal frame set below the walkway which is not visible from the street and which would only be visible when in the basement looking up.
- 3.5 This solution provides access to the building whilst retaining the historical stepped approach when not required. The solution offers compliance with relevant elements of the Equalities Act and British Standards.
- 3.6 The Guldmann Stepless’ SLP model D lift is specifically designed for historic buildings and is of the highest design standard. It has been used in some of the most prominent historical buildings in Europe including, The Cathedral of Notre-Dame, Paris, The French Senate building – the Palais du Luxembourg, Paris and The Danish Parliament building, Copenhagen
- 3.7 The proposed development consists of the following;
- Alterations to the existing front entrance steps and walkway from the public pavement to the entrance threshold, to allow ease of access to the ground floor hall, meeting rooms and offices;
 - Installation of the Guldmann Stepless’ SLP model D lift;
 - Concealment of the working parts of the lift within the framework;
 - Lift call button to be discreet and within the boundary of the property;
 - Maintain entrance so that it would retain a very similar appearance to existing;
 - No further visual alterations to the railings or front elevation;
 - The cast iron rails to either side of the front access path would be reinstated as existing;
 - Finishes to the surface of the lift in tiles of the same, or very similar appearance to the existing tiles.
- 3.8 All works are detailed on the submission drawings.
- 3.9 The proposals seek to follow the position given by the Council in the previously approved permission at Bedford Row that stated: *‘All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building. The reason given was: ‘To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017’.*

4 LEGISLATION AND PLANNING POLICY

- 4.1 Where any development may affect certain designated heritage assets, there is a legislative and policy framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.2 This Section includes the most relevant Guidance and Policy relating to the currently proposed development of the Appeal Site. The wider legislative and policy framework is included in Appendix C.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, September 2023)

- 4.3 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 4.4 It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.
- 4.5 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'.
- 4.6 For proposals that have the potential to affect the significance of a heritage asset, paragraph 194 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 195, which requires LPAs to take this assessment into account when considering applications.
- 4.7 Under 'Considering potential impacts' the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 4.8 Paragraph 201 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met.
- 4.9 Where less than substantial harm is identified, paragraph 202 requires this harm to be weighed against the public benefits of the proposed development, including, where appropriate, securing its optimum viable use.
- 4.10 Paragraph 206 stresses that LPAs '*should look for opportunities for new development within Conservation Areas....Proposals that....make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*'.

National Guidance

HEAN2: Making Changes to Heritage Assets (February 2016)

- 4.11 The purpose of this document is to provide information in respect of the repair, restoration and alterations to heritage assets. It promotes guidance for both Local Planning Authorities, consultants, owners, applicants and other interested parties in order to promote well-informed and collaborative conservation.

- 4.12 The best way to conserve a building is to keep it in use, or to find an appropriate new use. This document states that *'an unreasonable, inflexible approach will prevent action that could give a building new life...A reasonable proportionate approach to owners' needs is therefore essential'*. Whilst this is the case, the limits imposed by the significance of individual elements are an important consideration, especially when considering an asset's compatibility with Building Regulations and **the Equality Act**. As such, it is good practice for LPAs to consider imaginative ways of avoiding such conflict.
- 4.13 This document provides information relating to proposed change to a heritage asset, which are characterised as:
- Repair;
 - restoration;
 - addition and alteration, either singly or in combination; and,
 - works for research alone.

HEGN: Easy Access to Historic Buildings (June 2015)

- 4.14 Historic England's Guidance Note relating to easy access to Historic Buildings states that it advocates:
- **the broadest possible public access to the historic environment and to the interpretation that makes it come alive.**
 - **good quality solutions that make access easier while simultaneously encouraging responsible care of the historic places that matter to us all.**
 - **access solutions that combine conservation with excellent and innovative modern design.**
- 4.15 Historic England go on to say that:
- 3.2'...the aim should be to make a building's **main entrance accessible to everyone on a permanent basis**. Conservation constraints may arise from the design and character of the building's façade and setting and each building will have its own characteristics, which should, as far as possible, be respected in considering alterations for access...[.] Classical buildings, for example, are usually built to a single, unified plan that follows strict rules of symmetry and proportion...[.] the entrance is often set upon a base and approached by a flight of steps. Alterations to such buildings need to respect these rules, although sometimes relatively small-scale changes may break them without significantly affecting the appearance... Georgian and Victorian terraced houses with steps up to the front door can pose seemingly intractable problems in relation to access...When dealing with level changes and restricted space, the conservation concerns are likely to centre on issues of scale, proportion and continuity in materials, design and finish, as well as structural factors affecting corridor widths and floor levels'*

Strategic Policy

Local Planning Policy

- 4.16 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

Camden Local Plan (July 2017)

- 4.17 The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to

have robust, effective and up-to-date planning. The following are of relevance to built heritage and this Appeal Statement.

Camden Planning Guidance – Access for All (March 2019)

- 4.18 The Council has prepared this Camden Planning Guidance (CPG) on Access for All to support the policies in the Camden Local Plan. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional material consideration in planning decisions. This document should be read in conjunction with, and within the context of, the relevant policies in Camden's Local Plan referenced below.

6. Listed buildings and heritage assets

- 4.19 For listed buildings and other heritage assets, the Council will balance the requirement to provide access with the interests of conservation and preservation. **Sensitive design solutions that achieve access for all, to and within listed buildings, should be sought.** Measures to facilitate **dignified and easy access** to and within listed buildings can often be sensitively incorporated without damage to the buildings special architectural or historic interest.

Policy D1 Design

- 4.20 The Council will seek to secure high quality design in development. The Council will require that development:
- a. respects local context and character;
 - b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
 - c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
 - d. is of sustainable and durable construction and adaptable to different activities and land uses;
 - e. comprises details and materials that are of high quality and complement the local character;
 - f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
 - g. **is inclusive and accessible for all;**
 - l. incorporates amenity space;
 - o. carefully integrates building services equipment.

- 4.21 The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Excellence in design

- 4.22 The Council expects excellence in architecture and design seeking to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

Policy D2 Heritage

- 4.23 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

- 4.24 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.
- 4.25 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

- 4.26 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

- 4.27 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.

Policy C6 Access for all

The Council will seek to promote fair access **and remove the barriers that prevent everyone from accessing facilities and opportunities**. We will:

a. expect **all buildings and places** to meet the highest practicable standards of accessible and inclusive design so they can be used **safely, easily and with dignity by all**;

Bloomsbury Conservation Area Appraisal and Management Strategy Adopted 18 April 2011

4.28 The Character Appraisal and associated Management Strategy seek to provide a clear basis for the assessment of proposals and identify an approach to addressing issues that have the potential to impact on the special interest of Bloomsbury.

4.29 Owing to the size and complexity of the Conservation Area, it has been sub-divided into a series of character areas that generally share common characteristics to assist in defining those features that contribute to the area's special interest. The common characteristics of the sub areas and their constituent elements are broadly a function of a combination of the following: land use, density of development, scale and style of buildings, construction materials, period of development and influence of vegetation and open spaces. The assessment of the character and appearance of the area is based on the present day situation. Interest in an area may consequently derive from the combined effect of subsequent developments that replaced the earlier fabric as well from the original remaining buildings and street pattern.

Townscape Character Area (TCA) 7: Bloomsbury Conservation Area—Sub Area 10: Great James Street/Bedford Row, Camden Council

4.30 The Appeal Site is in Sub Area 10 - Great James Street/Bedford Row of the Bloomsbury Conservation Area. Originally laid out by Nicholas Babon, the streets here were further developed in the Georgian era as primarily residential areas, and characterised by large buildings which match the scale of the broad thoroughfares dating from the eighteenth and nineteenth centuries. A clear hierarchy of streets involves an evolution of scale which is also echoed within the detailing of the buildings, from Millman street through to the Grand Bedford Row. The TCA also includes areas of later 19th century terraces such as the Rugby estate, and twentieth century housing on Millman Street . Today the area contains a mixture of uses, with a trend towards converting buildings currently used for offices back to residential properties.

Significance

4.31 The significance of this TCA is derived from both its historic and architectural interest as a well preserved urban area of late eighteenth and early nineteenth centuries. For example, town houses along John Street and Doughty Street are examples of extraordinarily well preserved Georgian streets. The clear hierarchy of urban form found within the grid street layout is also matched by hierarchy of built form at building level, between town houses and mews buildings, indicative of both architectural and historic interest. Architectural interest is found in the elaborate detailing and proportion of the façade treatments of many of the buildings extant, with brick and stucco detailing indicative of the piecemeal nature of the building process of the time in terms of speculative development. Later construction in the late nineteenth and twentieth centuries is indicative of architectural and historic interest, illustrating the evolution of styles. The TCA includes many listed buildings themselves designated due to their special architectural and historic interest, many are townhouses noted for their strict adherence to classical proportions and detailing. Further listed buildings of note within the TCA include the red brick Holborn Police Station at the turn of the twentieth century, and the intricate elevation of the Yorkshire Grey Public House. Which both contain architectural interest.

Setting

4.32 The setting of the TCA contributes to its significance and is predominately defined by the other sub areas. These include Sub Area 5 and 3, Sub Area 6 and Sub Area 8. These have a positive contribution to the significance of the TCA, illustrating the historical development of the Sub Area.

Townscape

- 4.33 The townscape of the TCA is defined by a series of hierarchies working at a series of scales, from that of the urban to that of the individual building. This is broadly indicative of Georgian and Regency town planning. The grid of streets which constitute the TCA is divided up into wide thoroughfares with taller, larger townhouses matching the proportions of the street, such as Bedford Row, down to smaller street widths with smaller proportioned built form creating the street frontage. The architectural detailing within the principal faced of the buildings, fronting the streets, reflects their place within this hierarchy. The long terraces of townhouses of three or four storeys atop a basement which make up the central thoroughfares are paired with much lower mews buildings of two storeys, centred around much narrower streets. This relates to their previous function servicing the main town houses (with a garden between) and their low place within this urban, and indeed social, hierarchy. Urban form is further defined through the architectural treatment of buildings at corner plots, many of which are refaced within the nineteenth century and help to emphasise the corner areas. Vegetation is strictly composed and controlled and further helps to define the hierarchy of streets, and whilst the TCA contains no designed open space, regularly placed trees help to mark the more prominent thoroughfares. The natural topography of the locale is subsumed into the street layout, and evident when combined with planting to accentuate the grandeur of a street, such as within Grays Inn Road.

5 HERITAGE ASSESSMENT

Assessment of Significance

5.1 The NPPF defines significance as:

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

5.2 Heritage interests are defined in Planning Practice Guidance (PPG) which has been adopted in order to aid the application of the NPPF. The PPG defines the different types of heritage interest as follows:

- Archaeological interest: As defined in the Glossary to the NPPF, 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 skill, 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.

Significance of the Appeal Site

5.3 As late eighteenth to early nineteenth-century buildings, designed in the Georgian style, the significance of the Appeal Site is drawn from its architectural interest together with its historic interest. Despite alterations, the architectural interest of the listed buildings is evident both internally and externally. Externally this is visible in the symmetry of the elevations, continuing the principles of neo-classical, polite architectural design that were popular in the eighteenth and nineteenth centuries, presenting simple, restrained façades with limited architectural detailing or embellishment.

5.4 There have been various alterations, including:

- a. 10-11 Doughty Street - the demolition of non-original stud partition walls at ground floor level and strip out of modern ceiling, floor finishes and lighting and retrofitting of photovoltaic (solar) panels.
- b. Substantial alterations at 54-54 Doughty Street since its original construction include linked through openings within the party wall, a single storey rear extension added to the rear of no.54 and more recently the installation of partition walls at basement level and within the modern extension to the rear at ground floor level; removal of false chimney breast and suspended ceilings at ground floor level.

5.5 Despite these changes, the front elevations present typical examples of eighteenth/nineteenth-century, polite town planning and architecture, with the Appeal Site demonstrating a number of important design features of this era that are still appreciable within the Bloomsbury Conservation Area. These contribute to the historic and architectural interest of the listed buildings, which is also drawn from their development as part of the wider speculative residential development of Bloomsbury during the eighteenth and nineteenth centuries.

- 5.6 Both buildings are listed at Grade II and form parts of listings for the terraces at Doughty Street: 10-11 as part of *Numbers 1-19 and attached railings* and 53-54 as part of the listing of *Numbers 39-47 and 49-62 and attached railings*.

Significance of Bloomsbury Conservation Area

- 5.7 The significance of the listed buildings is also closely bound with their setting as part of Doughty Street and Sub Area 10: Great James Street/Bedford Row of the Bloomsbury Conservation Area.
- 5.8 As discussed in Section 4, the significance of Sub Area 10: Great James Street/Bedford Row, is derived from both its historic and architectural interest as a well preserved urban area of late eighteenth and early nineteenth centuries. Architectural interest is found in the elaborate detailing and proportion of the façade treatments of many of the buildings extant, with brick and stucco detailing indicative of the piecemeal nature of the building process of the time which was driven by speculative development.
- 5.9 The Appeal Site makes a high contribution to the significance of the relevant Sub-Area of the Bloomsbury Conservation Area as listed buildings that contributes to the historic and architectural interest of the urban area.

Impact of Appeal Scheme

Reason for Refusal 1

- 5.10 The Council gave the following reason for refusal for both Planning Permission Applications (2022.3756/P and 2022/3757/P) and (2022/4667/L and 2022/4669/L) on 7 March 2023:
- 1. The proposed works, by virtue of the detailed design and loss of historic fabric, combined with the prominent position of the entrance steps, would have a detrimental impact on the character and appearance of the host building which is Grade II listed, and the Bloomsbury Conservation Area, contrary to Policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.*
- 5.11 This is considered below, with the Appellant's response to the reason for refusal provided.

Impact on significance of the Appeal Site

- 5.12 The scale and design of the Appeal Scheme is considered to have a negligible impact on the special architectural and historic interest of the Appeal Site as Grade II listed buildings and is considered to cause the lowest level of less than substantial harm to the Appeal Site's significance. As referenced above, this significance is derived from both internal and external features of the Appeal Site. The Appeal Scheme will not impact the existing internal relationship between spaces and rooms within the listed buildings. The large, well-proportioned rooms that already cater for wheelchair access will remain intact and importantly there will be no requirement to widen, change or replace the existing front doorways or doors.
- 5.13 Externally Historic England Guidance describes a platform lift from street level through the lightwell to the basement being a potential solution to vertical access into a Georgian terraced house such as the Appeal Site. However, the Appeal Scheme is less intrusive than Historic England's suggestion. The proposal would avoid the potential impact of gates, tracking and return position conflicts from that kind of lift.
- 5.14 In this case, minor works will be required to insert the associated internal machine cabinets and controls. The installation of the lifting device will require new electrical services, a machine cabinet and associated controls. These will be located in the vaults under the footpath. However, installation of these will utilise existing penetrations and service voids/runs to ensure minimal disturbance of any historic fabric.

- 5.15 There will be no impact on the symmetrical elevations or the simple, restrained façades of the respective buildings; the limited architectural detailing and embellishment that contribute to their architectural and historic interest would remain unaffected by the simple unobtrusive design of the Guldmann Stepless SLP model D lift.
- 5.16 The existing brickwork underneath the entrance walkway is not currently visible. It has either been boxed in or rendered. Where it has been boxed in the proposed lift framework will not be visible. If the existing render is found to be in poor condition the proposal is to re-render to match the existing. Such works will not detract from the architectural and historic interest of the Appeal Site. It is apparent that the areas immediately beneath the steps have already undergone late twentieth century alteration.
- 5.17 Minor changes to historic fabric to accommodate the machinery would include some removal. However, the lost fabric does not have singular interest to distinguish it from its surrounding material, either architecturally or historically.
- 5.18 In the lightwell, the installation which would under-sail the vault. Its set-back from the cheeks of the vault, together with the screening effect of the railings along the back edge of footway means it would not be visible from street level. Regardless, the existing lightwells already include various appendages less discreet than the Appeal Scheme including meter boxes, canopies, ducts, pipes and cable trays which criss-cross the wells.
- 5.19 The street position of the call button has little place historically in the building. However, given its scale and location in the street railings, subject to its sensitive detailing and service routing, it will not detract from the architectural integrity of the listed building.
- 5.20 The proposed development would have no impact on the plan form and internal fabric of the listed buildings. Any loss of fabric would be limited and would not undermine their overall historic interest and the works would have a negligible impact on their overall significance.
- 5.21 As described above, and contrary to the Planning Officer's Delegated Report for 10-11 and 53-54 Doughty Street, the internal layout of the Appeal Site is already utilised effectively by disabled persons. A ramp, lift, wide doorways and circulation spaces, accessible kitchen and bathroom facilities, a vertical lift and automatic doors all facilitate existing wheelchair access. Only external access to the Appeal Site is limited.
- 5.22 The Council's decision to refuse permission of the Appeal Scheme demonstrates either a misunderstanding of the relevant legislation and policy documents or a failure to fully read all documents associated with the application, which may have affected the decision-making process. As Camden Council believe that there is limited internal access for disabled persons, they have misunderstood the extant layout and current use of the building and as such have also not weighed the public benefits of the Appeal Scheme, as prescribed in paragraph 202 of the National Planning Policy Framework (July 2021), against the lowest level of less than substantial harm that the proposals would incur. Given the nature of the current use of 10-11 Doughty Street and 53-54 Doughty Street and the current and ongoing regular accessible access requirements, making them more accessible would secure the optimum viable use of the building to be retained, with minimal impact to historic fabric and to the overall significance of the listed building.
- 5.23 In accordance with paragraph 202 of the NPPF, this lowest level of less than substantial harm should be weighed against the public benefits of the Appeal Scheme (in this case the provision of accessible access) including, where appropriate, securing the optimum viable use of 10-11 and 53-54 Doughty Street as designated heritage assets. Given the nature of the work carried out at the Appeal Site, the specific need of current employees and the regular accessible access required, the negligible impact the proposed development would have on the Appeal Site's significance is balanced with these public benefits and the opportunity to secure the building's optimum viable use.
- 5.24 In this context it is worth noting:

- Historic England's guidance on Easy Access to Historic Buildings (June 2015) which advocates, amongst other points, (see paragraph 4.20 of this Statement) *access solutions that combine conservation with excellent and innovative modern design with the aim being to make a 'building's main entrance accessible to everyone on a permanent basis'*; and
- Section 6 of the Council's CPG – Access for All (March 2019) which makes specific reference to *'Measures to facilitate dignified and easy access to and within listed buildings can often be sensitively incorporated without damage to the buildings special architectural or historic interest.'*

- 5.25 The Guldmann Stepless' SLP model D lift is specifically designed for historic buildings and is of the highest design standard. It has been used in some of the most prominent historical buildings in Europe including, The Cathedral of Notre-Dame, Paris, The French Senate building – the Palais du Luxembourg, Paris and The Danish Parliament building, Copenhagen.
- 5.26 It includes small-scale changes which are in proportion and importantly propose continuity of materials, design and finish. The Appeal Scheme would include a break in continuity of the existing step as a continuous element of construction. Notwithstanding this, the aesthetic harm would be very slight.
- 5.27 The Appeal Scheme achieves the aims of 'Access for All' in the Council's own planning guidance and in Historic England's Guidance note, referenced above, in making a building's main entrance accessible for all without significantly affecting its appearance.
- 5.28 The Council specifically references Policy D1 of the Camden Local Plan that proposed alterations should be:
- of the highest standard of design requiring consideration of character, setting, context and the form and scale of neighbouring buildings; and the proportions of the existing building; and
 - of good design and should respond appropriately to the existing context positively integrating with and enhancing the character, history, archaeology and nature of the existing buildings on the site and the other buildings immediately adjacent.
- 5.29 The same policy also states that the Council will seek to secure high quality design in development that *'is inclusive and accessible for all'* (D1 (g)).
- 5.30 The proposed solution is considered to meet the requirements of Historic England's guidance and the Council's CPG. Moreover, making the entrance into the listed building accessible would follow the same guidance by providing dignified access to the main entrance to everyone, on a permanent basis.
- 5.31 The Appeal Scheme would have a negligible impact and thus cause the lowest level of less than substantial harm to the significance of the Appeal Site.

Bloomsbury Conservation Area

Impact on Significance of Bloomsbury Conservation Area

- 5.32 The significance of the Bloomsbury Conservation Area (section 4 of this Statement) is derived from both its historic and architectural interest as a well-preserved urban area of the late eighteenth and early nineteenth centuries. Although the Appeal Site makes a high contribution to the significance of the relevant Sub-Area of the Bloomsbury Conservation Area as listed buildings, this contribution is predominately derived from the overall architectural design and symmetrical proportions of the Appeal Site as well as their historic detailing - all of these will be unaffected by the Appeal Scheme. This, combined with the scale and design of the Appeal Scheme, in comparison to the scale of the

Heritage Appeal Statement

Bloomsbury Conservation Area and the fact that variability is evident in the extant entrances in respect of the buildings and terraces on Doughty Street, indicate that the Appeal Scheme would cause no harm to the significance of the Bloomsbury Conservation Area.

6 SUMMARY AND CONCLUSIONS

- 6.1 This Heritage Appeal Statement responds to Camden Council's refusal of two Listed Building Consent applications for the part removal of existing entrance steps in order to install new vertical stair/platform lifts for step-free access at the Grade II listed 10-11 and the Grade II listed 53-54 Doughty Street.
- 6.2 The Statement includes an assessment of the significance of the listed buildings and identifies how the Appeal Scheme will affect that significance. It has demonstrated that the proposed development accords with relevant legislation, national planning policy and local planning policy and guidance, including site-specific guidance provided by the Council in considering the current application as set out in section 4 of this Statement.
- 6.3 The proposed development is of extremely high quality and has been sensitively designed. As described in this Statement the internal layout of the Appeal Site is already utilised effectively by disabled persons. A ramp, lift, wide doorways and circulation spaces, accessible kitchen and bathroom facilities, a vertical lift and automatic doors all facilitate existing wheelchair access. In fact, the only restrictions on wheelchair access and thus the only required changes relate to the entrance to the Appeal Site.
- 6.4 It is considered that the proposed development would have a negligible impact on the significance, or special architectural and historic interest, of the listed buildings and cause no harm to the significance of the Bloomsbury Conservation Area. The public benefits associated with the Appeal Scheme, as detailed in the Statement of Case, outweigh the lowest level of less than substantial harm of the Appeal Scheme. Furthermore, the proposed development would sustain the viable use of the building as a law firm's offices, providing a safe, dignified accessible passage through the main entrance.



APPENDICES

Appendix A

Listing Citations

Heritage Category: Listed Building Grade: II List Entry Number: 1271987

Date first listed: 14-May-1974

NUMBERS 1-19 AND ATTACHED RAILINGS, 1-19, DOUGHTY STREET

County: Greater London Authority, District: Camden (London Borough) , Parish: Non Civil Parish

National Grid Reference: TQ 30752 82184

TQ3082SE DOUGHTY STREET 798-1/96/309 (West side) 14/05/74 Nos.1-19 (Consecutive) and attached railings

GV II

Terrace of 19 houses. No.1, early C19; Nos 2-14, c1799-1800; Nos 15-19, c1792. Terrace completed by 1820. Built by J Wigg, G Slaton, J Wilson. Yellow stock brick with plain stucco band at 1st floor sill level. Most with evidence of tuck pointing. No.1: stucco ground floor with rusticated quoins. Plain stucco 3rd floor sill band. 4 storeys and basements. Double fronted with 3 windows, splayed 1-window corner treatment and 1-window return to Roger Street, plus single storey 7-window extension. On left hand angle of splay, chimney-stack rising from ground floor through the parapet. Projecting rusticated portico with C20 round-arched doorway having a radial fanlight and panelled door. Ground floor window on corner, round-arched; others with architraves and keystones. 1st floor windows to Doughty Street 2-pane square-headed sashes in segmental-arched shallow recesses. 2nd and 3rd floor windows with gauged brick flat arches to recessed 2-pane sashes. Parapet. Cast-iron plaque on return inscribed "St P x P 1821". INTERIOR: not inspected. Nos 2-5: Nos 3 & 4 now one house. Narrow 3rd floor sill cornice. 4 storeys and basements. 3 windows each. Projecting, round-arched, rusticated porticoes with cornices and later C19 doorways; half glazed (patterned) doors and patterned overlights. Doorway of No.4 replaced by a window. Gauged brick flat arches to recessed 2-pane sashes. Parapets. Nos 4 and 5 with original lead rainwater heads. INTERIORS: not inspected but No.5 noted to have stick baluster stair. Nos 6-19: slated mansard roofs with dormers. No.10 probably refronted. 3 storeys, attics and basements. 3 windows each. Round-arched doorways with panelled or recessed pilaster-jambs (Nos 9, 14 & 15 with attached columns), cornice-heads, most with patterned fanlights, and panelled doors. Gauged brick flat arches to recessed, mostly 2-pane, sashes. Nos 8 and 17 with cast-iron balconies to 1st floor windows. Stucco cornices and blocking courses, except Nos 17 & 18. Most houses have original lead rainwater heads and pipes. INTERIORS: not inspected, but Nos 10, 11 and 12 noted to have stick baluster stair. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. HISTORICAL NOTE: No.14 was the home of Sydney Smith, clergyman, author and wit (LCC plaque).

(Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: -1952: 50-54).

Listing NGR: TQ3075282184

Heritage Category: Listed Building Grade: II List Entry Number: 1356734

Date first listed: 14-May-1974, Date of most recent amendment: 11-Jan-1999

List Entry Name: NUMBERS 39-47 AND 49-62 AND ATTACHED RAILINGS

Statutory Address 1: NUMBERS 39-47 AND 49-62 AND ATTACHED RAILINGS, 39-47 AND 49-62, DOUGHTY STREET

County: Greater London Authority , District: Camden (London Borough) , Parish: Non Civil Parish

National Grid Reference: TQ 30786 82188

TQ3082SE DOUGHTY STREET 798-1/96/311 (East side) 14/05/74 Nos.39-47 AND 49-62 (Consecutive) and attached railings (Formerly Listed as: DOUGHTY STREET Nos.39-62 (Consecutive))

GV II

Terrace of 23 houses, excluding No.48 which is listed separately (qv). Nos 39-46 c1792; Nos 47-62 c1807-9; terrace completed by 1820. No.62 rebuilt in facsimile since 1974. Built by J Wigg, G Slaton and J Wilson. Multi-coloured stock brick most with evidence of tuck pointing; No.45 painted. Plain stucco first-floor sill band. Slate mansard roofs with dormers except Nos 53-55 and 62. Nos 39-47, 49-52 and 56-61: three storeys, attics and dormers. Three windows each; No.39 with four windows (one blind) and three-window return to Guilford Street. Round-arched doorways with panelled or recessed pilaster-jamb, cornice-heads, most with patterned fanlights and panelled doors. Nos 44-47, 49, 51 and 52 have doorways with stuccoed surrounds; Nos 57-61, doorways with Greek Doric engaged columns carrying cornice heads with guttae. Gauged brick flat arches to recessed, mostly 2-pane sashes. Nos 49, 52, 56, 57 and 60 with cast-iron balconies to first-floor windows. Stucco cornices and blocking courses, except No.39. Most houses with original lead rainwater heads and pipes. INTERIORS: not inspected. Nos 53-55 and 62: four storeys and basements. Three windows each, No.62 with 3-window return to Roger Street, plus three-storey three-window extension. Nos 53-54, round-arched doorways with moulded jamb and lion-head stops, cornice-heads and patterned radial fanlights. No.55 has projecting round-arched, rusticated stucco portico with cornice and later C19 doorway. Patterned, half-glazed door and overlight. No.62 has return with projecting Doric porch, part-glazed doors and patterned fanlight. Gauged brick flat arches to recessed sash windows; first-floor with cast-iron balconies. Cornice, continuing from other houses in terrace, at third-floor level. INTERIORS: not inspected but Nos 53-55 noted to have stick baluster stairs. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras, IV: London: -1952: 50-54).

Listing NGR: TQ3077682208

Appendix B Decision Notices

Application ref: 2022/4887/L
Contact: Josh Lawlor
Tel: 020 7974 2337
Email: Josh.Lawlor@camden.gov.uk
Date: 7 March 2023

Adaptation Design Ltd.
Hatfield Park
4 Carters Row
Great North Road
Hatfield
AL9 5NB



Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9UE
Phone: 020 7974 4444
planning@camden.gov.uk
www.camden.gov.uk/council

Dear Sir/Madam

DECISION

Planning (Listed Building and Conservation Areas) Act 1990

Listed Building Consent Refused

Address:
Offices And Premises
10 - 11 Doughty Street
London
WC1N 2PL

Proposal:
Replacement of existing stepped access to number 10 Doughty Street with a platform lift to provide wheelchair access.
Drawing Nos: 5038/06, 5038/02, 5038/04, 5038/05, 5038/01, 5038/03, BL-DCS-SLP-001.

The Council has considered your application and decided to refuse listed building consent for the following reason(s):

Reason(s) for Refusal

1 Reason for Refusal -

The proposed works, by virtue of the detailed design and loss of historic fabric, combined with the prominent position of the entrance steps, would have a detrimental impact on the character and appearance of the host building which is Grade II listed, and the Bloomsbury Conservation Area, contrary to Policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.

Informative(s):

1

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2021.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

Daniel Pope
Chief Planning Officer

Application ref: 2022/4889/L
Contact: Josh Lawlor
Tel: 020 7974 2337
Email: Josh.Lawlor@camden.gov.uk
Date: 7 March 2023

Adaptation Design Ltd
4 Carters Row
Great North Road
Hatfield
AL9 5NB



Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE
Phone: 020 7974 4444
planning@camden.gov.uk
www.camden.gov.uk/planning

Dear Sir/Madam

DECISION

Planning (Listed Building and Conservation Areas) Act 1990

Listed Building Consent Refused

Address:
63 - 64 Doughty Street
London
WC1N 2LS

Proposal:
Replacement of existing stepped access to number 54 Doughty Street with a platform lift to provide wheelchair access.
Drawing Nos: 5401/06, 5401/02, 5401/04, 5401/03, 5401/05, 5401/01

The Council has considered your application and decided to refuse listed building consent for the following reason(s):

Reason(s) for Refusal

1 Reason for Refusal -

The proposed works, by virtue of the detailed design and loss of historic fabric, combined with the prominent position of the entrance steps, would have a detrimental impact on the character and appearance of the host building which is Grade II listed, and the Bloomsbury Conservation Area, contrary to Policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017

Informative(s):

1

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2021.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

Daniel Pope
Chief Planning Officer

Appendix C LEGISLATION AND PLANNING POLICY

Legislation

Where any development may affect certain designated heritage assets, there is a legislative and policy framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.

This Section includes the most relevant Guidance and Policy relating to the currently proposed development of the Appeal Site. The wider legislative and policy framework is included in Appendix E.

Planning (Listed Buildings and Conservation Areas) Act, 1990

Section 16 (1) Subject to the previous provisions of this Part, the local planning authority or, as the case may be, the Secretary of State may grant or refuse an application for listed building consent and, if they grant consent, may grant it subject to conditions. (2) In considering whether to grant listed building consent for any works the local planning authority or 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.

The relevant legislation in this case extends from section 16 and section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving listed buildings and their setting.

The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.

The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas 'from time to time'.

For development within a conservation area section 72 of the Act requires the decision maker to pay 'special attention [...] to the desirability of preserving or enhancing the character or appearance of that area'. The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, July 2021)

The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.

It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.

Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'.

For proposals that have the potential to affect the significance of a heritage asset, paragraph 194 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 195, which requires LPAs to take this assessment into account when considering applications.

Under 'Considering potential impacts' the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.

Paragraph 201 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met.

Where less than substantial harm is identified, paragraph 202 requires this harm to be weighed against the public benefits of the proposed development, including, where appropriate, securing its optimum viable use.

Paragraph 206 stresses that LPAs '*should look for opportunities for new development within Conservation Areas....Proposals that....make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*'.

National Guidance

Historic England: GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

HEAN2: Making Changes to Heritage Assets (February 2016)

The purpose of this document is to provide information in respect of the repair, restoration and alterations to heritage assets. It promotes guidance for both Local Planning Authorities, consultants, owners, applicants and other interested parties in order to promote well-informed and collaborative conservation.

The best way to conserve a building is to keep it in use, or to find an appropriate new use. This document states that *'an unreasonable, inflexible approach will prevent action that could give a building new life...A reasonable proportionate approach to owners' needs is therefore essential'*. Whilst this is the case, the limits imposed by the significance of individual elements are an important consideration, especially when considering an asset's compatibility with Building Regulations and the Equality Act. As such, it is good practice for LPAs to consider imaginative ways of avoiding such conflict.

This document provides information relating to proposed change to a heritage asset, which are characterised as:

- Repair;
- restoration;
- addition and alteration, either singly or in combination; and,
- works for research alone.

HEGN: Easy Access to Historic Buildings (June 2015)

Historic England's Guidance Note relating to easy access to Historic Buildings states that it advocates:

- the broadest possible public access to the historic environment and to the interpretation that makes it come alive.
- good quality solutions that make access easier while simultaneously encouraging responsible care of the historic places that matter to us all.
- access solutions that combine conservation with excellent and innovative modern design.

Historic England go on to say that:

3.2'...the aim should be to make a building's main entrance accessible to everyone on a permanent basis. Conservation constraints may arise from the design and character of the building's façade and setting and each building will have its own characteristics, which should, as far as possible, be respected in considering alterations for access...[.] Classical buildings, for example, are usually built to a single, unified plan that follows strict rules of symmetry and proportion...[.] the entrance is often set upon a base and approached by a flight of steps. Alterations to such buildings need to respect these rules, although sometimes relatively small-scale changes may break them without significantly affecting the appearance... Georgian and Victorian terraced houses with steps up to the front door can pose seemingly intractable problems in relation to access....When dealing with level changes and restricted space, the conservation concerns are likely to centre on issues of scale, proportion and continuity in materials, design and finish, as well as structural factors affecting corridor widths and floor levels'

Strategic Policy

The London Plan: The Spatial Development Strategy for Greater London (Greater London Authority (GLA), March 2021)

Adopted in March 2021, the Mayor of London's spatial development strategy forms part of the development plan for Greater London. In particular, this document encourages the enhancement of the historic environment and looks favourably upon development proposals that seek to maintain heritage assets and their setting.

Policy HC1 London's form, character and capacity for growth

B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

2. utilising the heritage significance of a site or area in the planning and design process
3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

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.

Local Planning Policy

In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

Camden Local Plan (July 2017)

The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up-to-date planning.

Camden Planning Guidance – Access for All (March 2019)

The Council has prepared this Camden Planning Guidance (CPG) on Access for All to support the policies in the Camden Local Plan. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional material consideration in planning decisions. This document should be read in conjunction with, and within the context of, the relevant policies in Camden's Local Plan referenced below.

6. Listed buildings and heritage assets

For listed buildings and other heritage assets, the Council will balance the requirement to provide access with the interests of conservation and preservation. Sensitive design solutions that achieve

access for all, to and within listed buildings, should be sought. Measures to facilitate dignified and easy access to and within listed buildings can often be sensitively incorporated without damage to the buildings special architectural or historic interest.

Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:

- respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- is of sustainable and durable construction and adaptable to different activities and land uses;
- comprises details and materials that are of high quality and complement the local character;
- integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- is inclusive and accessible for all;
- responds to natural features and preserves gardens and other open space;
- incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- incorporates outdoor amenity space;
- preserves strategic and local views;
- for housing, provides a high standard of accommodation; and
- carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Excellence in design

The Council expects excellence in architecture and design seeking to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

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:

- c. the nature of the heritage asset prevents all reasonable uses of the site;
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - 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:

- require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- 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:

- resist the total or substantial demolition of a listed building;
- 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
- resist development that would cause harm to significance of a listed building through an effect on its setting.

Policy C6 Access for all

The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. We will:

- a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;

Bloomsbury Conservation Area Appraisal and Management Strategy Adopted 18 April 2011

The Character Appraisal and associated Management Strategy seek to provide a clear basis for the assessment of proposals and identify an approach to addressing issues that have the potential to impact on the special interest of Bloomsbury.

Owing to the size and complexity of the Conservation Area, it has been sub-divided into a series of character areas that generally share common characteristics to assist in defining those features that contribute to the area's special interest. The common characteristics of the sub areas and their constituent elements are broadly a function of a combination of the following: land use, density of development, scale and style of buildings, construction materials, period of development and influence of vegetation and open spaces. The assessment of the character and appearance of the area is based on the present day situation. Interest in an area may consequently derive from the combined effect of subsequent developments that replaced the earlier fabric as well from the original remaining buildings and street pattern.

Townscape Character Area (TCA) 7: Bloomsbury Conservation Area—Sub Area 10: Great James Street/Bedford Row, Camden Council

The Appeal Site is in Sub Area 10 - Great James Street/Bedford Row of the Bloomsbury Conservation Area. Originally laid out by Nicholas Babon, the streets here were further developed in the Georgian era as primarily residential areas, and characterised by large buildings which match the scale of the broad thoroughfares dating from the eighteenth and nineteenth centuries. A clear hierarchy of streets involves an evolution of scale which is also echoed within the detailing of the buildings, from Millman street through to the Grand Bedford Row. The TCA also includes areas of later 19th century terraces such as the Rugby estate, and twentieth century housing on Millman Street . Today the area contains a mixture of uses, with a trend towards converting buildings currently used for offices back to residential properties.

Significance

The significance of this TCA is derived from both its historic and architectural interest as a well preserved urban area of late eighteenth and early nineteenth centuries. For example, town houses along John Street and Doughty Street are examples of extraordinarily well preserved Georgian streets. The clear hierarchy of urban form found within the grid street layout is also matched by hierarchy of built form at building level, between town houses and mews buildings, indicative of both architectural and historic interest. Architectural interest is found in the elaborate detailing and proportion of the façade treatments of many of the buildings extant, with brick and stucco detailing indicative of the piecemeal nature of the building process of the time in terms of speculative development. Later construction in the late nineteenth and twentieth centuries is indicative of architectural and historic interest, illustrating the evolution of styles. The TCA includes many listed buildings themselves designated due to their special architectural and historic interest, many are townhouses noted for their strict adherence to classical proportions and detailing. Further listed buildings of note within the TCA include the red brick Holborn Police Station at the turn of the twentieth century, and the intricate elevation of the Yorkshire Grey Public House. Which both contain architectural interest.

Setting

The setting of the TCA contributes to its significance and is predominately defined by the other sub areas. These include Sub Area 5 and 3, Sub Area 6 and Sub Area 8. These have a positive contribution to the significance of the TCA, illustrating the historical development of the Sub Area.

Townscape

The townscape of the TCA is defined by a series of hierarchies working at a series of scales, from that of the urban to that of the individual building. This is broadly indicative of Georgian and Regency town planning. The grid of streets which constitute the TCA is divided up into wide thoroughfares with taller, larger townhouses matching the proportions of the street, such as Bedford Row, down to smaller street widths with smaller proportioned built form creating the street frontage. The architectural detailing within the principal faced of the buildings, fronting the streets, reflects their place within this hierarchy. The long terraces of townhouses of three or four storeys atop a basement which make up the central thoroughfares are paired with much lower mews buildings of two storeys, centred around much narrower streets. This relates to their previous function servicing the main town houses (with a garden between) and their low place within this urban, and indeed social, hierarchy. Urban form is further defined through the architectural treatment of buildings at corner plots, many of which are refaced within the nineteenth century and help to emphasise the corner areas. Vegetation is strictly composed and controlled and further helps to define the hierarchy of streets, and whilst the TCA contains no designed open space, regularly placed trees help to mark the more prominent thoroughfares. The natural topography of the locale is subsumed into the street layout, and evident when combined with planting to accentuate the grandeur of a street, such as within Grays Inn Road.