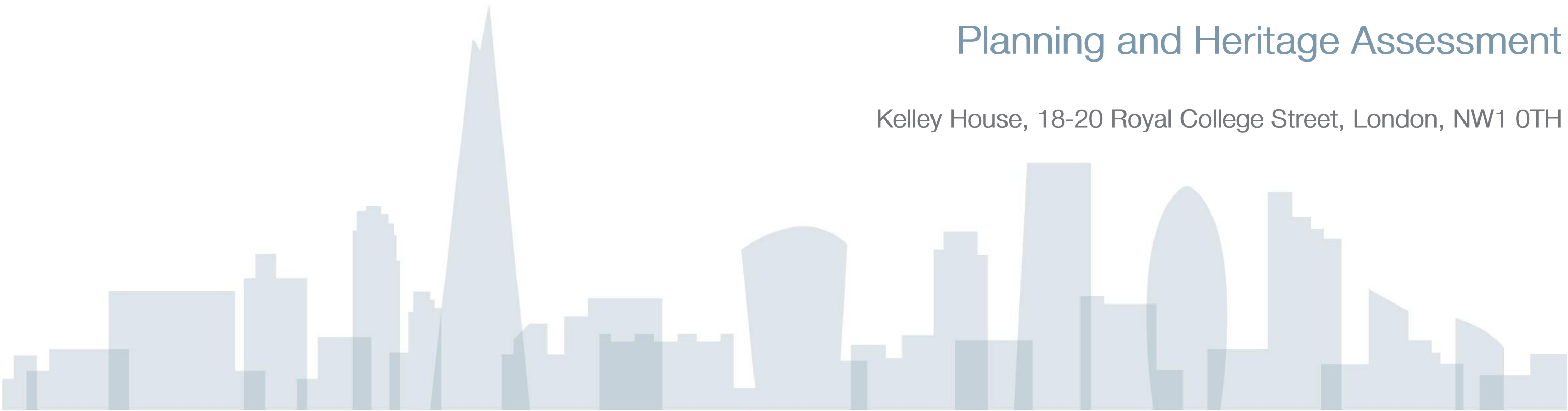


Planning and Heritage Assessment

Kelley House, 18-20 Royal College Street, London, NW1 0TH



London



Harrogate



Bristol

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2024/7463HER

1. Introduction and Site Context

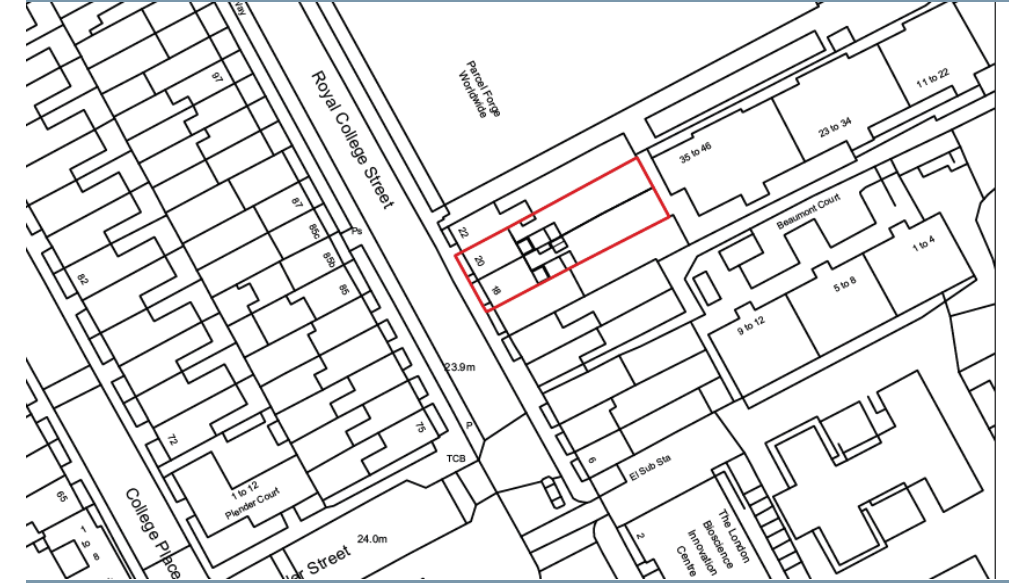
- 1.1. This Planning and Heritage Statement has been prepared by Heritage Potential, on behalf of a private client, to support an application for Full Planning Permission and Listed Building Consent (LBC) at Kelley House, 18-20 Royal College Street, London NW1 0TH.
- 1.2. Kelley House, 18-20 Royal College Street, comprises two joined terrace properties of four-storeys plus basement dating from circa 1790. The site is located in the London Borough of Camden.
- 1.3. The Grade II listed terrace consists of nos. 6-22 Royal College Street (list entry number: 1130407, listed on 18th March 1993). The listed terrace is not in a conservation area but sits adjacent to the Kings Cross St Pancras Conservation Area.
- 1.4. The Site is situated in a residential area, northeast of Mornington Crescent Underground Station and to the north of the Camden Campus of the Royal Veterinary College. It is bounded by Royal College Street to the west, Nos. 22 and 16 Royal College Street to the north and south respectively. The rear boundary faces east onto Beaumont Court which is a 7-storey student accommodation facility. Additionally, the listed terrace is adjacent to the Parcellforce London Central Depot, that occupies over 6,000 square meters, to the north.
- 1.5. The wider surrounding context includes a series of other heritage designations including locally listed buildings (non-designated heritage assets), Grade II listed terraces and the Grade I listed All Saints Greek Orthodox Church further north on Camden Street. These heritage assets are not impacted by the proposals.
- 1.6. This application seeks to regularise internal and external works at the site that have been implemented without benefitting from listed building consent or planning permission. The works in question occurred concurrently with the implementation of the Listed Building Consent 2023/0285/L "Internal alterations and refurbishment", granted on 7th February 2023. Consequently, a Listed Building Enforcement Notice (Council Reference EN23/0835) was served on 28th March 2024 by the London Borough of Camden (LB Camden).
- 1.7. The primary concern within the Enforcement was the loss of the original historic features. These features included sash windows to front and rear of the property, historic elements within the staircases, sections of the skirting boards and chimney breasts in both houses, and the historic plan form in places.
- 1.8. A series of informal pre-application meetings have subsequently been held with the London Borough of Camden, on 16th May 2024 with the Enforcement Team, and on 20th June 2024 with both the Enforcement Team and the Conservation Officer, where the approach to remedial works was discussed in detail. These meetings led to a productive dialogue between the client and the Council, that informed the strategy for this Planning and LBC submission, which seeks to regularise the unconsented works and remove all enforcement proceedings.
- 1.9. Following written feedback from officers, the items within the Enforcement Notice have been re-appraised and resulted in a new approach to mitigate the heritage harm caused by the unauthorised works. These detailed works are enclosed within this submission.

6-22 Royal College Street (Application Site Outlined in Red)



Source: Historic England 2019

Site Location Plan (Application Site Outlined in Red)



Source: Roger Mear Architects

6-22 Royal College Street Aerial View (Application Site Outlined in Red)

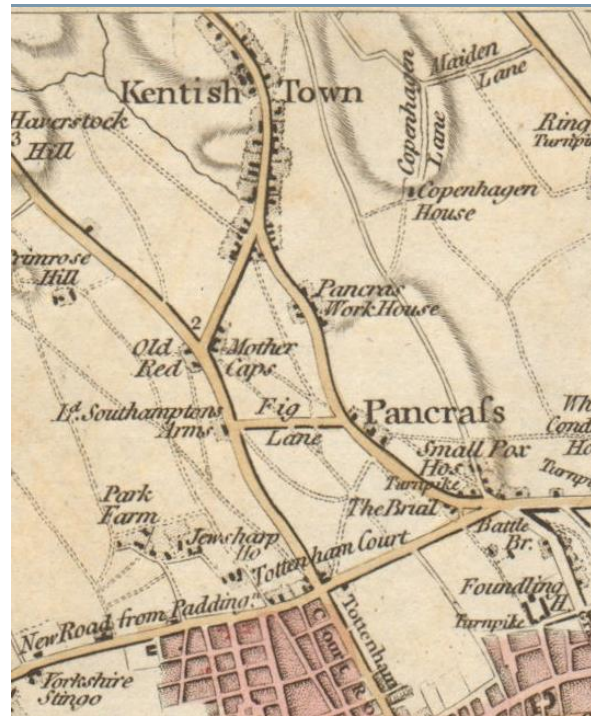


Source: Google Earth

2. Historical Background

- 2.1. Before the late 18th century, the area known as Camden was predominantly fields, with the village of Kentish Town situated to the north. In 1788, the 1st Earl of Camden, Charles Pratt, obtained building permission under the 'Kentish Town Act', initiating the development of the eastern side of the High Street. By 1790, building leases were being granted.
- 2.2. The western side of the High Street, owned by Lord Southampton, had already seen development by 1791. The Royal Veterinary College has also been established in 1791 and subsequently built on Royal College Street, with James Burton appointed as the architect.
- 2.3. Notably, two major developers involved in the Earl of Camden's estate were Messrs Kirkman and Hendry, likely responsible for constructing numbers 6-22 Royal College Street. When Royal College Street was initially developed, it did not attract much fashion or prestige, and it soon became a hub for light industry, particularly on its eastern side where The Fleet flowed between the back gardens.
- 2.4. In 1833-1834, Charles Goodall leased Nos. 12-18 Royal College Street, then known as Great College Street, and established a factory for the production of playing cards. His enterprise expanded rapidly, encompassing Nos. 20 and 22 Royal College Street, as well as a former gun factory located to the east. The company experienced a surge in productivity from the 1850s onward, following a reduction in stamp duty on packs of cards. Subsequently, additional land was acquired, and a substantial factory was erected behind Nos. 20 and 22, with the entrance through No. 24. However, the firm experienced a decline in the 20th century and was eventually sold in 1921.
- 2.5. Two famous French poets, Arthur Rimbaud and Paul Verlaine, lived in No. 8 Royal College Street in the 1870s.

J Cary 1786 Map

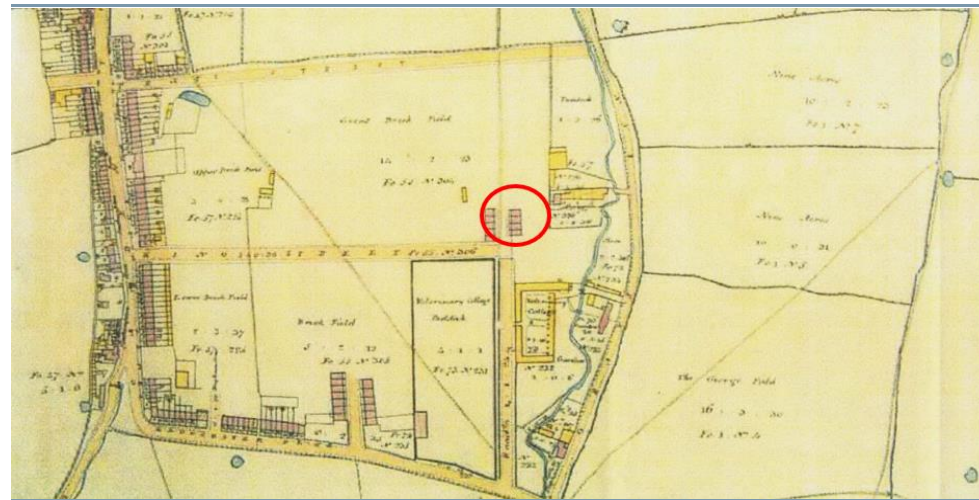


Source: Old Maps Online

18-20 Royal College Street

- 2.6. As mentioned above, the Grade II listed terrace of 6-22 Royal College Street was likely built by Joseph Kirkman and Alexander Hendry as part of the development of Lord Camden's Estate with 14-22 Royal College Street built around 1790, and Nos. 6 to 12 in the early 19th century.
- 2.7. Thompson's map of 1801 depicts Nos. 16-22 Royal College Street already constructed, while the rest of the terrace was constructed by 1830 as evident from Ordnance Map.
- 2.8. Subsequent Ordnance Survey Maps show some further change to the footprint of the terrace. The 1870 OS map is the first clear Ordnance Survey record and shows rear gardens laid out behind the terrace and what appears to be a small extension to the rear of No. 18. The consistency of the rear elevations appears to have been confused by this time and by 1894, projecting closet wing extensions are established across the rear of no. 12-22 Royal College Street.

1801 Thompson Map, Showing the Row of the Townhouses



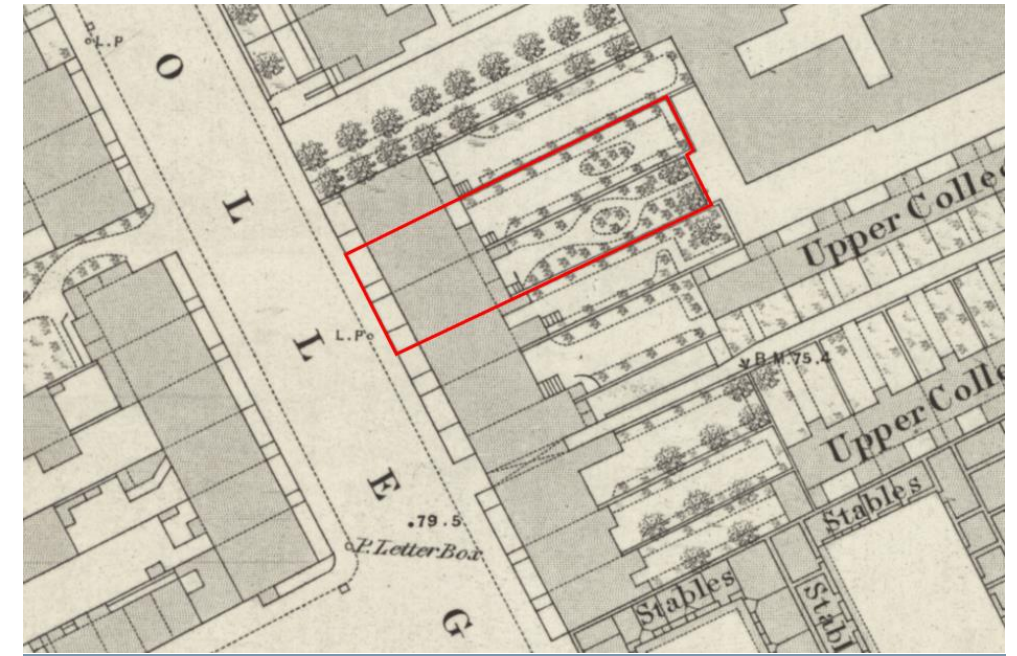
Source: Maps of London

Ordnance Survey Map of 1830



Source: Ordnance Survey Map

Ordnance Survey Map of 1870



Source: Ordnance Survey Map

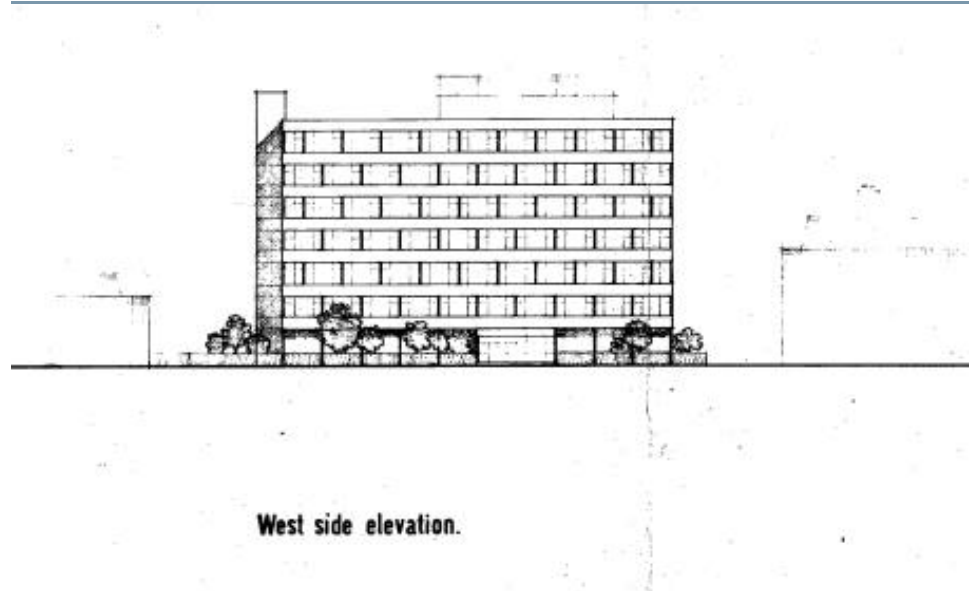
Ordnance Survey Map of 1894



Source: Ordnance Survey Map

- 2.1. There is little documentary evidence of the terrace from the early 20th century, but no's 18-20 Royal College Street are understood to have retained their residential use up until the 1990's.
- 2.2. Several attempts were made to demolish the terrace in the latter half of the 20th century through Planning Applications submitted between 1965 and 1970. The Royal Veterinary College sought approval from the London County Council for the demolition of the properties, citing their unsuitability for habitation. In the event of demolition, plans were proposed to replace the buildings with accommodation for students.

1970 Proposals for 6-22 Royal College Street



Source: Camden Planning Portal

- 2.3. As part of the application process, a report on the condition of the terrace was compiled by the Chief Medical Officer. The officer observed that the houses were two rooms deep, with six out of the nine occupied by employees of the veterinary college, and the remaining three by multiple families. Concerns were raised regarding the basement rooms, which were deemed unfit due to dampness, low ceilings, and inadequate lighting and ventilation.
- 2.4. However, the rooms on the ground, first, and second floors were generally considered sound, albeit with some floors exhibiting springiness or slope. Additionally, the window woodwork at the front of the houses was noted to be in poor condition. Some roofs were found to be leaking, and slight bulges were observed in the brickwork, both at the rear and front of the buildings.¹ Ultimately, none of the post-war efforts to entirely demolish and redevelop the site were successful and the terrace was Grade II listed in March 1993.
- 2.5. The Historic England listing describes No's 6-22 Royal College Street is as follows:

"Terrace of nine houses. Nos. 14-22: late C18, probably built by Joseph Kirkman and Alexander Hendy as part of the development of Lord Camden's Estate. Yellow stock brick with stuccoed ground floors and continuous second-floor sill band. Four storeys and cellar, two windows each. Round-arched entrances with later doors and fanlights. Gauged brick flat arches to recessed sashes, first floor having iron window guards. Parapet. Nos. 6-10: early C19. Yellow stock brick with stuccoed ground floor and first-floor band. Symmetrical design, the central house slightly projecting. Windows 1:2:1. Three storeys and basements; no. 8 with attic. Nos. 6 and 10 have round-arched ground floor openings; doorways have fanlights and later doors, sash windows with glazing bars. No. 8 has square-headed ground floor openings, doorway with overlight and later door and sash window with glazing bars.

Upper floors have gauged brick flat arches to later 2-pane sashes; no. 8 with an attic lunette sash. Stone-coped parapets of nos. 6 and 10, with brick modillions, sweep up to the higher parapet of no. 8 in the form of a pediment. Nos. 6-10 are not on a map of

1806 but appear by Greenwood's Map of 1827 flanking a lane known as Upper College Grove. No. 12: early C19. Built over the beginning of Upper College Grove and linking nos. 10 and 14 Royal College Street: pedestrian access only to the lane, now known as College Grove, via the round-arched right-hand passageway with the original cast-iron bollard. Three storeys and basement, two windows. Round-arched entrance with rusticated keystone, fanlight and later door. Gauged brick flat arches to recessed sashes; ground floor with glazing bars; upper floors, 2-pane. Parapet.

INTERIORS: not inspected but noted to retain some original features.

SUBSIDIARY FEATURES: attached cast-iron railings to areas.

- 2.6. The houses were in residential use until implementation of a 1990 permission for conversion to bail hostel personal to the Griffin Society (see planning history below). The Society operated the female only bail hostel until 1996 when its operation was taken over by Equinox Care (under contract to London Probation) who continued operation as a bail hostel until the property became vacant.
- 2.7. In 2010 listed building consent was approved and implemented for internal works and permission granted for continued use as a probation hostel.
- 2.8. In 2013 LB Camden accepted that the Lawful Use of the property was as a general hostel on the basis that the personal user condition had been breached for in excess of 10 years without enforcement action being taken.
- 2.9. The buildings have been utilised as a bail hostel for several decades until they were purchased by the appellant in December 2022, following a period of vacancy.

¹ GLC/MA/SC/02. Medical Officers report on 6-22 Royal College Street. 03/05/1968 [London Metropolitan Archives]

3. Planning History

3.1. The post listing planning history for the buildings is considered most relevant and summarised in the table below:

Application Reference	Validation Date	Description of Development	Date of Decision	Decision
2023/0285/L	07/02/2023	Internal alterations and refurbishment	07/02/2023	Granted
2013/4485/P	26/07/2013	Details of location, design and method of waste storage as required by condition 3 of planning permission 2010/2790/P	21/08/2013	Condition Discharge
2010/2793/L	07/06/2010	Internal alterations to listed building in association with the continued use as a probation hostel (sui generis).	15-07-2010	Listed Building Consent
2010/2790/P	07/06/2010	Continued use as probation hostel (sui generis).	13/07/2010	Conditional Permission
2010/1926/L	22/04/2010	Change of use from house of multiple occupation (Class C4) to probation hostel (sui generis) and associated alterations to listed building.	Unknown	Withdrawn
2010/1919/P	22/04/2010	Change of use from house in multiple occupation (Class C4) to probation hostel (sui generis).	Unknown	Withdrawn
9401373	30/08/1994	Construction of a boiler house at rear as shown on drawing no(s) 94019A and as revised by letter dated 3rd March 1994.	11/11/1994	Full Permission

Observations on Planning History

2010/2793/L “Internal alterations to listed building in association with the continued use as a probation hostel”.

- 3.2. This application proposed the following works:
- Insertion of two entry points between Nos. 18 and 20 at the ground and second floors.
 - Insertion of the corridor in No. 18 at first floor level.
 - Insertion within No. 20 at Ground Floor to create through room (Dining).
 - General internal refurbishment (including the replacement of the plaster ceiling).
 - Upgrading en-suites throughout.

3.3. CgMs produced a heritage statement in support of the 2010 application made the following observations on significance at this time:

“The building is listed for group value within the terrace at Nos. 6-22 Royal College Street. It retains almost nothing internally of any special interest with the exception of the general front and back arrangement of rooms and the overall floor plan i.e. the building can still be read on plan as two terraced properties with two different stair cores. The special interest is derived from the exterior envelope of the building, including the windows (some original, some 19' century), the brickwork and the architectural composition of the building. The closet wings are generally in line with the rest of the terrace and of an appropriate size and dimensions for this type of property.”

2023/0285/L “Internal alterations and refurbishment”

- 3.4. This Listed Building Consent sought internal and external alterations to refurbish the buildings to modern requirements, following continued deterioration within their use as a bail hostel.
- 3.5. The Heritage Statement, provided by Roger Mears Architects also observed a poor building condition in heritage terms, particularly in relation to the interior with little significant architectural detailing and original fabric left.
- 3.6. Their Impact Assessment is provided again in the table below for reference:

Heritage Impact Assessment Prior the Unauthorised Works

5.0 Impact Assessment

Existing situation	Significance	Proposed works	Impact on existing significance
Brickwork Rear extension parapet	Negligible/ Neutral	Rebuild existing parapet wall matching the neighbouring	Medium beneficial
Windows	Very High to the front Medium to the back	Overhaul and repair existing windows.	High Beneficial
Room layouts The front rooms are currently divided into two separate smaller rooms each of which has its own shower room.	Negligible/ Neutral	Removing the division walls in the front rooms and converting them into one large as it was historically. Lowering the ceiling of the new en-suites on ground, first and second floor so that room shape could be easily identified.	High Beneficial
Party Wall There are existing late openings in the party wall on the different floors.	Very High	The proposal seeks for blocking the existing openings and making a new one on the ground floor. This will lead to improvement in the functional scheme and the historic layout.	Low Beneficial
Internal finishes Plasterboard to ceiling and walls	Negligible/ Neutral	Like for like replacement	Neutral
Internal finishes Carpets over floorboards.	Negligible/ Neutral	No works are going to be done on flooring structure and floorboards. The carpets will be replaced.	Neutral
Internal finishes Doors – plain.	Negligible/ Neutral		Low Beneficial

Source: Roger Mears Architects

3.7. There is no officer report associated with application ref: 2023/0285/L. However, the decision notice provides the conservation officer's own observations on the impacts of the proposed works on the significance of the listed building, noting that:

“Much of the internal significance of the buildings has been harmfully lost over the twentieth century by reason of the loss of C18th (and presumably some C19th) fabric and erosion of plan-form. The proposals seek to repair what remains of the historic fabric like-for-like and to reverse some of the form to planform, notably through closing the party wall openings at all floors bar third”.

Summary

3.8. The observations made by heritage professionals on these two applications help to inform the significance of the pre-existing building before the unconsented alterations were undertaken. They are therefore a helpful baseline through which to appraise the current application proposals, that seek to regularise the position on site.

4. Heritage Significance of 18-20 Royal College Street

- 4.1. This Section provides a summary of the significance of the heritage assets potentially affected by the works. This is considered to be the Grade II listed 6-22 Royal College Street (list entry number 1130407). This is the only heritage asset relevant to application proposals.
- 4.2. The assessment is based on historical research of publicly available sources and archives, as well as extensive investigation into the planning history. This is the only way to inform of the baseline significance of the site, prior to the alleged unlawful works contained in the enforcement notice.
- 4.3. The research indicates that the terrace has been subject to piecemeal alterations, both externally and internally, over the course of its long history. This includes rear extensions, replacement doors and windows to some properties, and significant internal remodelling.
- 4.4. Internally, 18-20 Royal College Street has undergone significant alteration and changes of use over time, as observed in the planning history documents. This has clearly served to diminish their contribution to the architectural and historic interest of the group overall. This is the general context through which the position on site must be assessed in relation to impacts on the wider terrace.
- 4.5. The significance of 18-20 Royal College Street is as follows:

Archaeological Interest

- 4.6. The site is not located within an Archaeological Priority Area, but further archaeological assessment would be required to confirm the site lacks archaeological interest. This is beyond the scope of this assessment.

Historic Interest

- 4.7. The site possesses historic interest as part of the early development of the Lord Camden's Estate in the 1790's and early 19th century. The Georgian terrace has evidential value, reflecting late Georgian townhouses in an immediate street scene that allows for an appreciation of historic setting. The development also illustrates the spread of middle-class Georgian housing within the area at a time of rapid urban expansion and early retrofit for commercial use. There is little inherent historic value derived from the fabric internally, besides areas of retained floorboards and the structural fabric of the townhouses. This is testament to the long history of evolution, adaptation and changing of use across the terrace.

Architectural and Artistic Interest

- 4.8. The façade of 6-22 Royal College Street terrace is undoubtedly its principal interest, as a typical well-preserved Georgian terrace with good interface between other buildings of a similar period. Despite the uniformity of architectural style, Nos. 6-12 are later additions, displaying distinct differences in their height, form and external proportions and detail. The sash windows, characteristic of 14-22 Royal College Street, have largely remained as a feature, although the presence of hopper style windows and uPVC create some discontinuity across the frontage. The front lightwells retain some historic sash picture windows, but generally this feature is mixed across the frontage through alterations to the sash picture windows and many lightwell have been part infilled under the bridge access at ground floor.
- 4.9. It is believed that, prior to the unauthorised works, the sash windows of 18-20 Royal College Street were historic, contributing positively to the integrity of the terrace. Prior the

construction works, Roger Mears Architects stated: *"the architectural composition together with the preserved windows and visible historic brickwork is contributing to the special interest of the building and the street view"*. This is agreed as a key factor in the retained significance of the heritage asset.

- 4.10. The consistency of the rear elevations appears to have been modified through the late 19th century and late 20th century, including the development of projecting closet wing extensions across the terrace, as well as piecemeal single storey extensions.
- 4.11. Internally, the site represents only two properties in the group from which an assessment of significance can be based. They are generally two rooms deep with a single staircase opposite the entrance to each property at the rear of the buildings. The staircase provides access to each floor with access at 2nd floor level onto the flat roof of the rear closest wing extensions in each. Much of the internal significance of the buildings has been lost over the twentieth century by reason of the loss of C18th (and presumably some C19th) fabric and erosion of planform.
- 4.12. Prior to the unauthorised works, the only remaining significant internal feature of the interiors was fragments of the balustrade of the main staircase and some areas of skirting board. According to Roger Mears Architects, prior the unauthorised works, there were *"some historical surviving details within the staircase – railings and balustrade, of Victorian age"* but, otherwise *"none of the original details were preserved"*.
- 4.13. The plan form within both buildings was altered to provide multiple rooms. Despite that, they can be generally read as they were planned with the main dividing walls and staircase kept in their original location. The buildings also still can be read on plan as two terraced properties with two separate staircases.
- 4.14. The noted alterations have significantly reduced the heritage significance of the interiors and their contribution to the special interest of the group as a Georgian terrace of the 1790's. The overall historic and architectural interest of the house is high externally, and very low internally.

5. Legislation, Policy and Guidance

Heritage Legislation

- 5.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislation and foundation on which further policy, and guidance relating to the conservation of the historic environment is built. Section 66 of the Act relates to the ‘general duty as respects listed buildings in exercise of planning functions’, with Section 66 (1) stating that when deciding whether to grant planning permission for a development, special regard must be given by the local authority to the “*desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*” (Planning Act 1990, Section 66).
- 5.2. Section 66 (2) of the Act states that “a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings”.

NPPF (Updated in December 2023)

- 5.3. The National Planning Policy Framework, with which all Local Development Plans must comply, constitutes the national level of planning policy and is a material consideration in planning decisions. The NPPF was originally introduced in March 2012 and was subsequently updated and published on 24 July 2018. The 2018 update broadly retains the wording of the 2012 Chapter on Conserving and Enhancing the Historic Environment (Chapter 16).
- 5.4. The NPPF was updated again in February 2019 in order to provide definitions for housing need. No paragraph numbers changed as a result of this update. Similarly, an update was published in July 2021 and September 2023 with no associated changes to paragraph numbers.
- 5.5. The most recent update was published on 20 December 2023. This update did not cause any changes to national heritage policy.
- 5.6. The NPPF represents a continuation of the philosophy contained within Planning Policy Statement 5 (PPS5), introduced in 2010 and one of a number of planning policy documents replaced by the NPPF in 2012.
- 5.7. The NPPF uses slightly different terminology to the Act and emphasises that authorities should take account of “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation” (Paragraph 196).
- 5.8. ‘Conservation’ is defined within the NPPF as “the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance” (p.69).
- 5.9. No definition of ‘preservation’ (or any variant) is contained within the document. However, Historic England advise that both ‘conservation’ and ‘preservation’ are concerned with the management of change which seeks to sustain the special interest or significance of heritage assets. ‘Conservation’ has the addition of taking opportunities to enhance significance where it is possible and considered to be appropriate. This is discussed in Historic England’s 2018 publication Decisions: Legal Requirements for Listed Building and Other Consents.
- 5.10. The NPPF also helps to define other key terms within heritage policy. These are provided within the table below.

Term	Definition
Heritage Assets	“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).” (p.70)
Designated Heritage Assets	“A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.” (p.69)
Significance	“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.” (p.75)
Setting of a Heritage Asset	“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.” (p.75)

- 5.11. Chapter 16 specifically relates to conserving and enhancing the historic environment (paras. 195-214).
- 5.12. Paragraph 200 stipulates that within applications, applicants are required to describe the significance of the heritage assets affected and the contribution made by their setting. Local authorities should also identify and assess the significance of the heritage assets affected by a proposal.
- 5.13. This should be taken into account when assessing the impact of a proposal on a heritage asset (Paragraph 201). Paragraph 203 of the NPPF goes on to state that when determining applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness. (p.58)
- 5.14. Paragraphs 205-214 of the document discuss how potential impacts to heritage assets should be considered with paragraph 199 stipulating a requirement for great weight to be given to an asset’s conservation when considering the impact of a proposed development on its significance. The weight given should reflect the importance of the asset (p.59).

NPPF Degrees of Harm

- 5.15. Where harm to the significance of a designated heritage asset is identified, the NPPF requires clear and convincing justification of the proposals. The document categorises levels of harm as: total loss; substantial harm; and less than substantial harm.

- 5.16. Paragraph 207 states that where a development would lead to substantial harm to (or total loss of) the significance of a designated asset, local planning authorities should refuse consent, unless it can be demonstrated that such harm is necessary to achieve substantial public benefits that outweigh that harm, or all of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site; and
 - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - conservation by grant-funding or some form of not for profit, 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.
- 5.17. Paragraph 208 states that where a proposed development will lead to less than substantial harm to the significance of a designated asset, this should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 5.18. In the case of impact on non-designated heritage assets, Paragraph 209 states that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

5.19. Planning Practice Guidance (PPG)

- 5.20. The PPG offers guidance as to what public benefits may constitute and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 8). Public benefits may include heritage benefits, such as:
- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
 - reducing or removing risks to a heritage asset
 - securing the optimum viable use of a heritage asset in support of its long-term conservation

London Plan (2021)

- 5.21. The London Plan also contains relevant policies for the city-wide context within which individual boroughs must set their local planning policies. The plan dedicates specific sections to heritage conservation, such as Chapter 7: Historic Environment, where policies and strategies for safeguarding heritage assets are outlined.
- 5.22. Policy HC1 of the London Plan 2021 suggests that the cumulative impacts of incremental change from development on heritage assets and their settings should be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 5.23. The Paragraph 7.1.6 of the Policy also acknowledges: “*Historically, London has demonstrated an ability to regenerate itself, which has added to the city’s distinctiveness and diversity of inter-connected places. Today urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement, repair and beneficial re-use of heritage assets that are on the At-Risk Register. In some areas, this might be achieved by reflecting existing or original street patterns and blocks, or revealing and displaying archaeological remains; in others, it will be expressed by retaining and reusing buildings, spaces and features that play an*

important role in the local character of an area. Policy D1 London’s form, character and capacity for growth further addresses the issue of understanding character and context.”

LB Camden Planning Policy

Camden Local Plan 2017

5.24. Policy D1 ‘Design’ states that:

‘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;
- h. Promotes health;
- i. Is secure and designed to minimise crime and antisocial behaviour;
- j. Responds to natural features and preserves gardens and other open space;
- k. 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;
- l. Incorporates outdoor amenity space;
- m. Preserves strategic and local views;
- n. For housing, provides a high standard of accommodation; and
- o. Carefully integrates building services equipment.

5.25. Policy D2 ‘Heritage’ states that 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.

Designated Heritage Assets

5.26. 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.

5.27. 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.

5.28. 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.

Draft Camden Local Plan 2023

5.29. The Council has started preparing a new Local Plan for Camden. This will in time replace the current Camden Local Plan (2017) and Site Allocations Plan (2013). It sets out the Council’s vision for future development in Camden for the next 15 years and includes the planning policies and site allocations to help achieve this. The Council consulted on the draft new Local Plan from 17 January to 13 March 2024.

5.30. In relation to built heritage, the Draft Local Plan contains Chapter 12: Design and Heritage that states that “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.”

5.31. Policy D5 E “Sustainability Improvements to Designated Heritage Assets” emphasises:

“The Council will support proposals to adapt and improve listed buildings, and buildings within conservation areas, to reduce energy demand, mitigate the impacts of climate change and ensure they are adaptable to a changing climate provided they do not cause significant harm to the special historic or architectural interest of the heritage asset. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the Council will weigh that harm against the public benefits of the proposal, giving significant weight to measures that respond to the climate emergency in a sensitive manner.”

Camden Design SPG (2021)

5.32. The Camden Planning Guidance covers a range of topics (such as heritage, housing, sustainability, amenity and planning obligations) and so all of the sections should be read in conjunction, and within the context of Camden’s Local Plan.

5.33. The overarching key design messages underline the council’s commitment to excellence in design and that schemes should consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials;
- Creating well connected public spaces and good quality public realm
- Opportunities for promoting health and well-being
- Opportunities for improving the character and quality of an area.

5.34. Section 3 of the SPG considers heritage design. Its key messages are:

- Camden has a rich architectural heritage, and we have a responsibility to preserve, and where possible, enhance these areas and buildings.
- The Council will only permit development within conservation areas that preserves and where possible enhances the character and appearance of the area.
- The conservation area statements, appraisals and management plans contain further information and guidance on all the conservation areas.
- Most works to alter a listed building are likely to require listed building consent.
- The significance of ‘Non-Designated Heritage Assets’ (NDHAs) will be taken into account in decision-making.
- Historic buildings can and should address sustainability and accessibility.
- Heritage assets play an important role in the health and wellbeing of communities.

5.35. The following documents have also been referred to in this Statement:

- Camden Planning Guidance Energy efficiency and adaptation, 2021
- London Borough of Camden Retrofitting Planning Guidance, 2013

6. Proposals

- 6.1. The proposals have arisen following two pre-application meetings with London Borough of Camden, that included feedback from the conservation and enforcement teams. These have sought to regularise the works undertaken without planning permission or LBC and remove any further enforcement proceedings altogether. Upon approval of these works, the buildings can restart the process of long-term re-occupancy.
- 6.2. As a result of the pre-application engagement, the items within the Enforcement Notice have been reconsidered and resulted in a new approach to mitigate the heritage harm caused by the unauthorised works.
- 6.3. In relation to the enforcement notice, the proposals seek the following:
- Fully comply with 9 items;
 - Apply for retrospective permission for 2 as-built items; and
 - Apply for remedial works for 8 as-built items.
- 6.4. The list of "To be actioned" items is provided below. In the table, items highlighted in green indicate those enforcement requirements that are to be fully complied with, items highlighted in yellow indicate those proposed for remedial works that is different to that stated in the enforcement notice, and items highlighted in red indicate the works for which retrospective permission will be applied.

No.	Enforcement Item
Item 1	Completely remove all laminated timber/composite sash windows located on the front and rear elevations across ground to third floor levels of both properties and insert single-glazed timber sash windows to match in profile, materiality, and designs of those that previously existed.
Item 2	Completely remove the two laminated timber/composite doors located at the second-floor extensions' rear terraces of both properties and insert single-glazed timber doors to match in profile, materiality, and design of those that previously existed.


Item 3	Completely remove the laminated timber/composite picture window and door fittings of both properties, insert single-glazed timber picture windows to match in profile, materiality, and design of those that previously existed, and infill the resultant gaps with brickwork and render this new brickwork with lime-based render internally and externally to match existing.
Item 4	Reinstate the front lightwell access into the 'Storage Rooms' located at basement level of both properties to match in profile, materiality, and design of those that previously existed in accordance with "Drawing 2245-12"
Item 5	Completely remove the timber-faced boiler outbuilding and ancillary plant equipment at the rear garden.
Item 6	Completely remove the handrail, spindles, newels, and risers of the two modern staircases of both properties and insert handrail, spindles, newels and risers to match in profile, materiality, and design of those that previously existed.
Item 7	Completely remove all recessed LED lights which are located in all rooms of both properties (except for No.18's ground floor rear room and Nos.18-20's first floor utility rooms) and make good the resultant gaps to match the existing ceilings.
Item 8	Completely remove the kitchenettes that are located in the front and rear rooms of both properties at basement level and front and rear rooms of No.20 at ground floor level, and insert the consented 'TP (Tea Points)' in accordance with Drawing "2245-12" and "2245-13" of the 2023/0285/L consent (Appendix 3 and 4, respectively)
Item 9	Completely remove the kitchenettes located in the front and rear rooms at first, second, and third floor levels of both properties.
Item 10	Following the removal of the kitchenettes in the ground and first floor rear rooms of No.20, reinstate the sections of removed chimney breast with brickwork and make good this brickwork to match existing.
Item 11	Completely remove the alcove infills adjacent to their respective chimney breasts


Item 12	Completely remove the ensuites located in all front rooms and the associated modern ensuite doorways (doors and architraves) located in the respective rear rooms of both properties, infill the resultant gaps in these rear room walls to match the existing, make good the ceilings where appropriate to match existing, and insert the consented ensuites in accordance with Drawings "2245-13", "2245-14", "2245- 15", "2245-16", and "2245-19" of the 2023/0285/L consent.
Item 13	Completely remove the modern doorway (door and architraves) in the party wall between No.18's ground floor rear room and No.20's ground floor hallway, then infill the resultant gap with brickwork and make good this brickwork to match existing.
Item 14	Completely remove the ensuite located in the ground floor rear room of No.18 and insert the consented ensuite in accordance with Drawing "2245-13" of the 2023/0285/L consent (Appendix 4).
Item 15	Reinstate the front room access into the 'Storage Rooms' located at basement level of both properties to match in profile, materiality, and design of those that previously existed in accordance with "Drawing 2245-12" (Appendix 3 – circled in orange)
Item 16	Completely remove all modern entrance doors of all rooms of both properties and insert the consented doors in accordance with Drawing "2245-19" of the 2023/0285/L consent
Item 17	Completely remove all modern door architraves of all rooms, hallways and landings of both properties and insert architraves to match in profile, materiality, and design of those that previously existed.
Item 18	Completely remove all modern skirting boards located in all rooms, hallways, and landings of both properties and insert skirting boards to match in profile, materiality, and design of those that previously existed.
Item 19	Completely remove the MDF floorboards in the hallways and landings of both properties at ground, first, second, and third floor levels.

7. Proposals and Heritage Impact Assessment

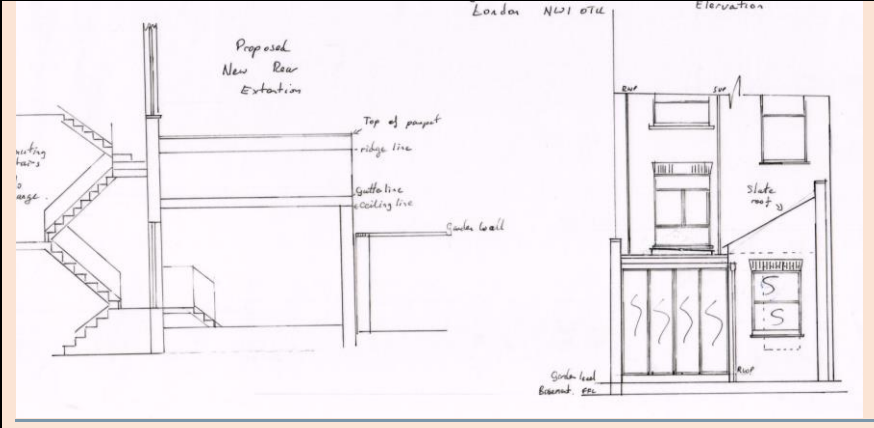

7.1. The application proposals have been categorised in accordance with the Listed Building Enforcement Notice (LBEN) for ease of reference. Those items that are to be fully complied with are noted in green. Those items in which these applications propose an alternative solution to the LBEN are discussed in yellow. Those items that seek retrospective permission for the ‘as built’ position are discussed in red


No.	Requested Enforcement Action	Application Proposals	Description	Heritage Impact Assessment
Item 1	Completely remove all laminated timber/composite sash windows located on the front and rear elevations across ground to third floor levels of both properties (as identified in Appendix 1 – outlined in red) and insert single-glazed timber sash windows to match in profile, materiality, and designs of those that previously existed.	Replace the existing double glazed top and bottom sashes to the front and rear elevations across ground to third floor levels of both properties with new timber frame single glazed sashes of more historically appropriate design.	<p>It is proposed to insert single-glazed upper and lower sashes on the front and rear elevation. These are to match details of the glazing bars of adjoining number 16 which are likely to be original:</p> <p>The existing sash frames are timber and of traditional design and are not considered to have a detrimental impact on the significance of Kelley House as a designated heritage asset. The boxes will be retained.</p> <p>Windows and doors to the modern rear extensions will be retained.</p> <p>Page 6 of the associated Design and Access Statement (DAS) provides more details, including detailed moulding profiles of the proposed sashes.</p> <p>Window details drawing is also submitted as part of this application: 2245-(31)01 – Window details.</p>	<p>The proposals seek to mitigate the heritage harm identified as a result of the ‘as built’ position, which involved total replacement of some historic windows with modern double-glazed alternatives.</p> <p>To minimise and mitigate against this harm, the following measures are necessary:</p> <ul style="list-style-type: none">• The existing sashes will be replaced with traditional timber sash windows that closely replicate a close match to the original window design, incorporating run through glazing bars. The profile of the glazing bars and any relevant mouldings is modelled after appropriate historic examples found within the terrace, as well as archival photographs that document the original profiles.• The existing sash frames, which are made of timber and are of a traditional design, do not adversely affect the significance of Kelley House as a designated heritage asset. Therefore, the box frames will be retained.• Single glazing will be reinstated as historically appropriate. <p>As a result, the timber sash windows will match in profile, materiality, and designs of those that previously existed. Consequently, the harm caused to the significance of the heritage asset will be mitigated.</p>
Item 2	Completely remove the two laminated timber/composite doors located at the second-floor extensions’ rear terraces of both properties (as identified in Appendix 1 – outlined in orange) and insert single-glazed timber doors to match in profile, materiality, and design of those that previously existed.	Retain two timber doors located at the second-floor extensions’ rear terraces of both properties.	<p>The as-built doors are timber, not composite.</p> <p>NB: Conservation officer’s comment dated 28.06.2024 highlights:</p> <p><i>“The works can be retained but (in light of the below advice) in order to reduce the chances for refusal and overall benefit to the property, <u>there should be proposed corresponding benefits of a similar scale elsewhere</u>. Otherwise, will need to be reinstated as per prior to the works – requirement 2 of the notice.”</i></p>	<p>The OS maps from the 19th century, as presented in Section 2 of this Statement, indicate that the two-storey closet wings are not part of the original layout of the buildings but were added early on, between 1870 and 1894, and were consistently applied across the group. They offer a degree of architectural and historic interest by virtue of their age and insight into the development of the entire group during this time.</p> <p>While the closet wings offer some architectural interest, the doors in question provide access to modern balconies atop of them. The balconies are not a constituent part of the terrace that contribute positively in heritage terms. The original design, which featured a pitched roof over the closet wing, is still observable at the adjacent properties, Nos. 16 and 14.</p> <p>The 1985 application supports the understanding that the balconies are modifications to a historic feature. This is evident in the application reference 8501284 for 22 Royal College Street “Change of use and works of conversion to provide 3 self- contained flats and 1 self-contained maisonette including the provision of 2 balconies at the rear and other external alterations, applying for the provision of two balconies”. This application approved the conversion from the typical hipped roof closet wing to a flat roof with balcony atop, as also seen at the appeal site.</p> <p>The unauthorised works at the site included under this enforcement item refer to the replacement of the existed 10-pane single-glazed 20th- century door with a double-glazed single door design that provides access to the balcony spaces. The replacement doors are of the same colour, have a comparable breakdown in fenestration pattern, fit comfortably within the modern openings and the door design has been applied consistently across both properties of the appeal site. To this end, they are akin to a like for like replacement aesthetically, to a very small, secondary, and fundamentally altered constituent part of the terrace.</p> <p>These are notable material considerations in determining whether the site’s ‘character’ as a building of special interest could even be impacted by these works. Historic England Guidance HEAG304 ‘Listed Building Consent’ notes at page 30 that where “door furniture has often been replaced regularly and the alteration, replacement or removal of demonstrably modern door furniture will not affect special interest or need LBC” then this would not constitute a work where listed building consent is required. Nonetheless, the slight change in fenestration pattern and change from single to double glazing could be considered enough to require LBC</p> <p>Furthermore, double glazing and modern replacement doors can ensure spin off benefits that align with other critical policy areas. The Camden Plan 2017 supports the enhancement of sustainable design within the area. LB Camden declared a climate emergency in 2020 which includes a commitment to do “everything we could to make Camden a zero-carbon borough by 2030”.</p>

				<p>Historic England Advice Note 18 “Adapting Historic Buildings for Energy and Carbon Efficiency” (July 2024) confirms: “<i>The replacement of windows which do not contribute to the architectural or historic interest of a building with double-glazed windows of sympathetic pattern, will generally be acceptable. Many historic buildings have windows which are relatively recent and do not contribute to a building’s special interest. In such cases, their replacement with double-glazed windows of an appropriate material, glazing bar pattern and detailing is likely to either have a neutral impact or to enhance significance</i>”. In applying this rationale to upper floor doors in the context of this proposed item, the alterations would be consistent with policy and guidance objectives around, heritage, design and sustainability.</p> <p>The replacement doors have been designed to be visually sympathetic to the established character of the terrace, and they do not detract from the heritage asset’s overall significance. Therefore, it is proposed to retain the ‘as built’ double glazed doors in this location.</p> <p>Rear Doors to the Balconies: Existed and Replaced</p> <div></div> <p>Source: The Appellant Archives</p>
Item 3	Completely remove the laminated timber/composite picture window and door fittings of both properties (as shown in Appendix 2), insert single-glazed timber picture windows to match in profile, materiality, and design of those that previously existed, and infill the resultant gaps with brickwork and render this new brickwork with lime-based render internally and externally to match existing.	Replace the existing double-glazed doors and picture window with sets of French doors and sash windows of traditional design.	<p>It is proposed to retain the existing access to the lightwell from the lower ground floor front rooms in order to provide an improved amenity space for these studios and, at the same time, facilitate access to the electric cupboard for maintenance (that should not be accessed by users of the room).</p> <p>It is proposed to provide traditionally detailed and historically appropriate single glazed French doors, leading into the lightwell, and sash window.</p> <p>In compliance with the conservation officer’s comment, a sash window will be aligned with the window above and separated from the door by a masonry pier (i.e. an improvement on the previous condition to offset the harm of a door).</p> <p>Pages 6 and 7 of the DAS provide detailed information on the proposed specifications of the arrangement.</p> <p>The arrangement is detailed in the drawing 2245-(02)15-C Proposed Elevations.</p>	<p>The proposed arrangement of the basement lightwell aligns with that of many neighbouring properties that have sought direct basement access to the lightwell. Indeed, permission was granted in 1984 for No. 16 to install a door in this location (albeit pre-listing).</p> <p>It must be accepted that one of the most varied characteristics of the terrace’s front elevation is the arrangement of openings into the lightwell at basement level. While some of these replacement solutions, that include inserted doors, are not particularly sympathetic. They do create a baseline context in which aesthetically sensitive door/window arrangements could be appropriate to the wider terrace, without undermining its established significance.</p> <p>A further argument for maintaining this arrangement is the difficulty associated with matching new brickwork to the existing material in the event the door is removed. There is a substantial risk that the outline of the removed door would remain visible, potentially leading to historical confusion and detracting from the building’s aesthetic appeal. This potential for a visually displeasing and historically confusing result supports the case for retaining the current door/window arrangement with an improved aesthetic solution.</p> <p>The traditional French doors and sash window to the lightwell, would not be an alien feature to a London terrace of this age and have responded to pre-application feedback, by allowing the features to line up better with the windows above and contribute positively and holistically to the front elevation overall.</p> <p>Given, the pre-existing picture window was not historic, the lightwell arrangement across the terrace is varied, and the proposed door designs are heritage led, also allowing the use of the lightwell as amenity space, the proposals are not considered to be harmful to the group listed terrace.</p>

Item 4	Reinstate the front lightwell access into the 'Storage Rooms' located at basement level of both properties to match in profile, materiality, and design of those that previously existed in accordance with "Drawing 2245-12" (Appendix 3 – circled in red).	To comply.	A new door will be fitted internally, and lock shut for safety reason to prevent unauthorised access to the electric cupboard. The proposed relocated kitchenettes will be sufficiently set back from the locked door.	Reinstating the original doorway configuration will mitigate the damage to the significance of the floorplan layout of this listed property.
Item 5	Reinstate the front room access into the 'Storage Rooms' located at basement level of both properties to match in profile, materiality, and design of those that previously existed in accordance with "Drawing 2245-12" (Appendix 3 – circled in orange)			
Item 6	Completely remove the timber-faced boiler outbuilding and ancillary plant equipment at the rear garden.	Retain the existing boiler house/plant room to the rear.	<p>The existing boiler house/plant room to the rear of the property replaced an outbuilding previously approved in 1994.</p> <p>The as-built plant room occupies a similar footprint to the pre-existing outbuilding and is a lightweight timber-faced structure of subtle and honest design. Being slightly taller, the outbuilding has improved functionality and capacity in supporting both elements of the listed properties, while still remaining subservient to the designated heritage asset.</p>	<p>The previous outbuilding located to the rear of no. 18 at the Application site obtained permission in 1994 under application number 9401373 30-08-1994 "18-20 Royal College Street Construction of a boiler house at rear as shown on drawing no(s) 94019A and as revised by letter dated 3rd March 1994". The application records for this application do not contain drawings. Nonetheless, the pre-existing boiler house was a single storey pitched roof shed that sat between the modern single storey extensions to each closet wing (see photos below). It had a sizeable metal flue that rose up to discharge at first floor level. It appears marginally wider than the 'as built' replacement boiler room.</p> <p>The pre-existing position also had two sheds located behind no. 20, circled in red to the right.</p> <p>Pre-Existing Photo of Rear Elevation (Sheds Circled Red)</p>  <p>Source: Roger Mears Architects</p> <p>The replacement boiler room to the rear of no. 18 is taller, rising at its highest point to the lowest point of the modern ground floor closet wing extension which has a mono-pitched roof. It sits flush with the rear wall of the existing ground floor extension at the eastern end.</p> <p>The boiler house has been necessary to accommodate supporting mechanical plant for the general hostel use across both properties, since the early 1990's. The external rear location is subtle and avoids greater intervention to the internal floor plan of the listed building.</p> <p>The new structure replaces the lawful pre-existing shed in its entirety and the principle of some form of ancillary boiler house is considered acceptable in this area. The two sheds to no. 20 have been removed entirely. Therefore, the 'as built' position has resulted in the significant net reduction of the outbuildings at the rear of nos. 18 and 20, allowing for a better appreciation of the rear elevation of Kelley House.</p>





			<div>Existed (to the left) and replacement (to the right) outbuildings to the rear of No. 20 Royal College Street.</div> <div></div> <div>Source: Heritage Potential Research</div> <div><p>The key question is whether the moderate uplift in scale and alterations to the design of this new single structure is such that it would negatively impact the special interest of the wider Grade II listed terrace.</p><p>In this respect, the structure is not appreciable from any public views and is very well screened from most private views out of the rear elevations, by virtue of being located between existing projections of a more permanent nature. This is a betterment from the pre-existing boiler sheds that occupied a similar position and the structure to the rear of no. 18 accommodated a sizeable and much more visible metal flue that rose up above the ground floor extensions, contributing to an unsightly and out of keeping feature in the context of the rear terrace area.</p><p>The new boiler house construction, materiality and character remains consistent with that of a garden shed and the pre-existing lawful position, while also ensuring the other two structures are removed. The design also allows it to read as an ‘honest’ and lightweight feature that does not confuse the phasing of the listed building nor unduly draw the eye in any private views. Its mono-pitch construction is complimentary in form to the existing ground floor mono-pitched roofs that it adjoins, and which almost entirely enclose the structure.</p><p>Although it is slightly taller than the previous structure, it remains subordinate not only to the entire heritage asset but also to the modern extension to which it is attached.</p><p>To this end, its potential to negatively impact the special interest of the listed building beyond the pre-existing position must be very low. Indeed, it features as a more formalised and coherent design approach than compared to the pre-existing position, when noted in its established context.</p><p>It is relevant to note here that the rear areas of the terrace have already been subject to significant alteration and extension over time, which influence its character and contribution to the special interest of the heritage asset. There are precedents of permissions for extensions and outbuildings at neighbouring properties, including at nos. 22, 20, 18, 16, 14, 12, 10 Royal College Street have all been subject to rear extensions. Nos. 16 and 10 Royal College Street have infill extensions between their ground floor rear extensions, as proposed in the appeal proposals. One of the most recent relevant examples is from 2014 (applications 2014/3352/P and 2014/3538/L) for 10 Royal College Street, which involved the erection of a single-storey rear extension at basement and ground floor levels, with permission granted for planning and listed building consent.</p><p><i>2014/3352/P and 2014/3538/L: 10 Royal College Street: Erection of a single storey rear extension at basement and ground floor levels.</i></p></div>
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				 <p>Source: Camden Planning Portal</p> <p>The rear of the terrace, demonstrating the extensions to the properties</p>  <p>Source: Google Earth</p> <p>In summary, the planning history confirms that shed type outbuildings has previously been permitted in this location and extensions of a more permanent nature are apparent on other properties in the terrace. While of a more functional design, the 'as built' ancillary structure is also lightweight, honest, reversible, and very well screened. The outbuilding is not in a conservation area and for the reasons set out above, it would not harm the special interest of the listed building. Planning Permission and LBC should be granted for such an ancillary facility to support the lawful use, consistent with previous approvals.</p> <p>As agreed at pre-application stage, the structure has no potential to impact residential amenity and design/heritage is the only material consideration on this item.</p>
Item 7	Completely remove the handrail, spindles, newels, and risers of the two modern staircases of both properties and insert handrail, spindles, newels and risers to match in profile, materiality, and design of those that previously existed.	<p>To comply.</p> <p>The existing modern handrail, spindles, newels, and risers of the two staircases of both properties will be replaced with new historically appropriate handrail, spindles, newels and risers.</p>	<p>The design will replicate in profile and materiality of those that might have previously existed and will take into account the building hierarchy.</p> <p>The proposed design will incorporate timber risers and half landings, traditionally designed slender balusters and newel posts. A simple square newel post will be used at basement and upper floor, in keeping with the historic hierarchy of these levels which were usually used as service spaces.</p> <p>The detailed drawings of the handrail, newel and balustrade are also submitted as part of this application:</p>	<p>Most of the pre-existing newels and spindles had already been lost when the property was purchased. Of the two properties, the central staircase at no. 20 retained few original spindles, however these had already been replaced with simple newels at almost all levels. Almost all the features at no18 were lost.</p> <p>The current proposal intends to reinstate a more traditional design spindles, newel posts and handrail in keeping with the pre-existing features and taking into account the hierarchy inherent to the building of the Georgian architectural style. This approach ensures that the new elements are sympathetic to the building's architectural style, historical period, original status and location.</p> <p><u>A well-designed replica of the original staircase at all levels offers a heritage benefit compared to the previous arrangement, which featured crude alterations, mismatched styles and an overall poor condition of the staircases.</u></p>

			<p>2245-(24)01- Balustrade details Basement & Third Floor; and</p> <p>2245-(24)02- Newel & handrail details Ground_ First & Second Floor.</p>	<p>Pre-existing No18 Ground Floor Level Staircase; Pre-existing No20 Second Floor Level Staircase</p>  <p>Source: Roger Mears Architects</p>
Item 8	Completely remove all recessed LED lights which are located in all rooms of both properties (except for No.18's ground floor rear room and Nos.18-20's first floor utility rooms) and make good the resultant gaps to match the existing ceilings.	To comply.		
Item 9	Completely remove the kitchenettes that are located in the front and rear rooms of both properties at basement level and front and rear rooms of No.20 at ground floor level, and insert the consented 'TP (Tea Points)' in accordance with Drawing "2245-12" and "2245-13" of the 2023/0285/L consent (Appendix 3 and 4, respectively)	Retain the as-built kitchenettes in their current location, with the exception of the basement front rooms, and the ground and first floor rear rooms of No. 20.	<p>The as-built kitchenettes have mostly been installed in the approximate location of the pre-existing basins and are connected to the existing drainage. They consist of kitchen units of small size and simple design which can be removed at any time without any further damage to the historic fabric.</p> <p>The as-built kitchenettes in the basement front rooms will be relocated to allow for the reinstatement of a pre-existing door opening.</p>	<p>The design of the kitchenettes has been carefully considered to ensure that it does not detract from the historic proportions of the interiors or the original plan form, while also meeting the modern requirements of the properties long term future use.</p> <p>However, it is acknowledged that the potential effect of the installed kitchenettes and the steps required to alleviate their impact on the listed building is variable, depending largely on their location.</p> <p>The kitchenettes in the front rooms of the basement level currently obstruct the doorways that previously led to the storage room in the lightwell. This arrangement is not appropriate as it impacts the legibility of the original access/egress from basement to the lightwell, albeit if they were retained in this area through a relocation away from these doorways, the kitchenettes would not necessarily be harmful.</p>
Item 10	Completely remove the kitchenettes located in the front and rear rooms at first, second, and third floor levels of both properties.		<p>The as-built kitchenettes at the ground and first floor rear rooms of No. 20 will be removed, the chimney breasts restored and then refitted back into their 'as built' positions.</p> <p>The new arrangement is detailed in the proposed floorplans submitted with the application.</p>	<p>Similarly, the kitchenettes, at the ground and first floor rear rooms of No.20, that that have been installed in a manner that has resulted in the loss of small sections of brickwork out of chimney breasts (historic fabric) are also not appropriate, albeit if the kitchenettes were retained in the same locations, but designed to fit around the chimney breasts, as is the case across second and third floor level, these kitchenettes would not necessarily be harmful.</p> <p>The 10 kitchenettes located in the front room of no. 20 at first floor, front and rear rooms of no. 18 at first floor and front and rear rooms of both properties at second and third floors do not harmfully impact the established plan form of the properties. 4 of the kitchenettes sit in the alcove area and have some overlapping with the chimney breasts (first floor no. 18 rear, second floor rear of both properties and third floor rear of no. 20), however they have not removed any of the brickwork from the chimney breast to achieve this arrangement.</p> <p>Furthermore, the legibility of the chimney breasts in all these locations was compromised in the pre-existing (pre-2023) position, as well as in the consented position through the infilling of the alcoves with en-suites in front and rear rooms at all levels. As such, maintaining the legibility of these chimney breasts has not been a requirement in heritage terms over the course of the most recently approved application. In fact, the presence</p>

				<p>of a kitchenette, by virtue of their size and permeable design, would serve to better reveal the chimney breasts in these rooms, when compared to partitions to demarcate en-suites that would effectively infill the alcove. <u>In positions where the 'as built' kitchenettes interact with chimney breasts, they represent a heritage benefit when compared to the consented position.</u></p> <p>The kitchenettes located elsewhere at first, second and third floor are located in positions that are away from the chimney breasts and they mostly occupy positions with pre-existing infrastructure for drainage, given the previous hostel sink basins occupied similar positions. The kitchenettes are designed in the same way throughout the property, returning a holistic design approach to each constituent part of the site. The kitchenette design is also split between modestly sized low- and high-level storage cupboards with permeability through to the wall where the sink is located, meaning their presence reads in a similar way to furniture or storage shelves, by retaining a good understanding of the original scale and proportions of the room.</p> <p>All the factors noted above are important in supporting the understanding that "listed building consent ought to be granted for the works" and the kitchenette features are a very modest and light touch installation, particularly given the historic use and facilities provided at the site.</p>
Item 11	Following the removal of the kitchenettes in the ground and first floor rear rooms of No.20, reinstate the sections of removed chimney breast with brickwork and make good this brickwork to match existing.	To comply.		
Item 12	Completely remove the alcove infills adjacent to their respective chimney breasts	To comply.		
Item 13	Completely remove the ensuites located in all front rooms and the associated modern ensuite doorways (doors and architraves) located in the respective rear rooms of both properties, infill the resultant gaps in these rear room walls to match the existing, make good the ceilings where appropriate to match existing, and insert the consented ensuites in accordance with Drawings "2245-13", "2245-14", "2245- 15", "2245-16", and "2245-19" of the 2023/0285/L consent (Appendices 4, 5, 6, 7, and 8, respectively).	<p>To retain the current room layout and the location of the all as-built en-suites.</p> <p>Replace the full ceiling height to pods at ground and first floors.</p>	<p>The as built en-suites replace the previously existing shower cubicles within each room, which already altered the original historic layout, and are connected to the existing drainage.</p> <p>At ground and first floor, where sufficient headroom is available, en-suites partitions and ceilings will be adapted to reinstate the originally approved 'pod' design.</p> <p>The new arrangement is detailed in the proposed sections submitted with the application.</p>	<p>En-suite partitions have never reflected the original floorplan in the terrace. They were inserted in the 1990s.</p> <p>The existing en-suites replace the previously existing shower cubicles within each room, which already altered the original historic layout, and are connected to the existing drainage. As the pre-existing partitions were modern, their demolition did not result in any loss of historic fabric.</p> <p>The enforcement item requires the insertion of the consented ensuites in accordance with Drawings "2245-13", "2245-14", "2245- 15", "2245-16", and "2245-19" of the 2023/0285/L consent. The consented position within these drawings shows 2 en-suites areas within both front and back rooms. The consent requires the insertion of larger, partitioned spaces within all rooms at all levels, that eats into the floorspace of both rooms and is less efficient with the available floorspace. This design also arguably had a greater impact in terms of confusing the original plan form.</p> <p>The current layout is a rationalisation and improvement from the pre-existing floor plan, as well as the consented floorplan, in taking a consistent and less space consuming approach in order to offer a consistently readable floorplan across all levels. It offers a clearer understanding of the historic layout of the front and rear rooms.</p> <p>While the double depth plan off the stairwell remains readable, this solution requires the erection of less partitions, therefore, preserving a less interrupted and coherent double depth plan form. The 'as built' arrangement provides the studio rooms with more space by erecting less partitions to provide the en-suite facilities for the front and rear rooms.</p> <p>In consenting the layout of en-suites under application ref: 2023/0285/L, the conservation officer acknowledged that <i>'the proposed provision of ensuite bathrooms does not cause any additional harm to the buildings as they re-provide ensuites which have already been in place for many years, and in most rooms, they enhance significance by allowing more of the original planform of the room to be read. The proportions of all of the front rooms are better reinstated than the extant condition, and the original circulation of front and rear room off the landing is reinstated at first and second floor.'</i> The 'as built' arrangement would also achieve this observation and similarly ought to be granted listed building consent under the same rationale.</p> <p>Fundamentally, the nature of the stud partitions to facilitate the en-suites is a matter of impacts on plan form, as the areas in question are broadly the same in terms of drainage infrastructure and no removal of fabric or alterations to decorative features has taken place. However, it has been demonstrated that the solution that requires the erection of less partitions would be more sensitive and appropriate.</p>
Item 14	Completely remove the ensuite located in the ground floor rear room of No.18 and insert the consented ensuite in accordance with Drawing "2245-13" of the 2023/0285/L consent (Appendix 4).			

				<p>The above factors demonstrate that the 'as built' plan form requires less physical intervention than compared to the pre-existing and the consented position, the latter of which requires more partitions.</p> <p>At basement level, the 'as built' arrangement ensures that the legibility of the chimney breast remains discernible. This would be lost if returning to the consented arrangement, which is a heritage benefit.</p> <p>This combination of works is considered the most sensitive in terms of impacts to plan form and room proportions, in comparison to the pre-existing or consented position.</p>
Item 15	Completely remove the modern doorway (door and architraves) in the party wall between No.18's ground floor rear room and No.20's ground floor hallway, then infill the resultant gap with brickwork and make good this brickwork to match existing.	To comply.		<p>The properties were originally separate entities with no connecting doorways between. However, this has been altered during its long-term use as a hostel. This proposal aims to enhance the historic floor layout at the ground floor by respecting the initial division between the properties. <u>Hence, the removal of the opening on the ground floor between the properties will result in a heritage benefit by reinstating the floor layout.</u></p>
Item 16	Completely remove all modern entrance doors of all rooms of both properties and insert the consented doors in accordance with Drawing "2245-19" of the 2023/0285/L consent	Existing entrance doors to each room will be retained, grooves infilled, sanded and re-painted in white, in order to achieve a simple plain appearance.		<p>The photographic record and both the 2010 (2010/2793/L) and 2023 (2023/0285/L) application heritage assessments, show that none of the original doors remained in the properties. The most recently approved installation of entrance doors to rooms was conducted solely for health and safety purposes for the bail hostel under application ref: 2010/2793/L. The baseline contribution of the interior fit out at no.18 and 20 to the contribution of the significance of the terrace is very poor, this certainly extends to the entrance doors of rooms at all levels that have not contributed to significance for a very long time.</p> <p>The existing doors that do not currently benefit from LBC are of a very simple timber design and could match to a variety of interior fit outs. Nonetheless, in order to ensure they are as subtle and versatile (in design terms) as possible, the aim is to retain the existing doors, infill their grooves, sand and repaint in white, in order to achieve a very simple, plain appearance.</p> <p>The replacement of architraves and skirting boards with a more traditional, moulded profile, akin to a what might be expected in a Georgian townhouse, will assert the hierarchy within the building, which is a heritage benefit. However, the provision of typical panelled doors is not considered essential to meet this aim and the retention and retrofit of the current doors would fit comfortably within traditionally designed surrounds. It would also allow for the re-use of a considerable amount of timber. This is considered an appropriate level of intervention in relation to the established significance of the interior and would not be harmful.</p>
Item 17	Completely remove all modern door architraves of all rooms, hallways and landings of both properties and insert architraves to match in profile, materiality, and design of those that previously existed.	It is proposed to remove the previously installed features and reinstate traditional architraves and skirting boards within the hallway, stairwell and landings, in keeping with the historic character of the building and respecting the hierarchy of each level	<p>Existing architraves and skirting boards to each room will be replaced with historically appropriate painted plain timber architraves, similar to the pre-existing.</p> <p>Traditional skirting boards will also be fitted to all rooms.</p> <p>The detailed drawings of the architraves, and skirting boards are also submitted as part of this application:</p> <p>2245-(31)10- Architrave details; and</p> <p>2245-(43)01- Skirting details.</p>	<p>The current proposal intends to reinstate traditionally designed architraves and skirting boards in keeping with the pre-existing features and taking into account the hierarchy inherent to the building of the Georgian architectural style. This approach ensures that the new elements are sympathetic to the building's architectural style, historical period, original status and location.</p> <p><u>A well-designed replica of the original architectural details at all levels offers a heritage benefit compared to the pre-existing arrangement, which featured crude alterations, mismatched styles and an overall poor condition of those details.</u></p>
Item 18	Completely remove all modern skirting boards located in all rooms, hallways, and landings of both properties and insert skirting boards to match in profile, materiality, and design of those that previously existed.			
Item 19	Completely remove the MDF floorboards in the hallways and landings of both properties at ground, first, second, and third floor levels.	<p>Retain acoustic panels on the top of the existing floorboards in the entrance hallway and rooms.</p> <p>Finish landings and half landings with timber</p>		<p>It has been confirmed that the original floorboards in the corridors of both properties are preserved beneath the newly installed MDF acoustic-specific flooring.</p> <p>The reversible floorboards serve a protective function, preserving the underlying original floor by acting as a shield against direct wear, scratches, dents, moisture penetration, and even providing insulation against sound transmission given the presence of acoustic chipboard. This additional layer thus contributes to the maintenance and longevity of the original flooring.</p>

		floorboard, acoustic panels and carpet.		<p>Therefore, the works should be permitted on the grounds that they are reversible and serve to protect the historic structure, at a time when restoration of the timber floorboards is not feasible.</p> <p>However, the half landings in both properties between the stairs do not retain any timber floorboards beneath them. In these areas timber floorboards will be reinstated.</p> <p>The Staircase and the Landing Prior the Works</p>  <p>Source: The Appellant Archive</p> <p>'As Built' Boarding Over Floorboards in no. 18 Entrance Hall</p>  <p>Source: Heritage Potential Research</p>	<p>The Hallway Prior the Works</p>  <p>Source: Heritage Potential Research</p> <p>'As Built' Boarding Over Floorboards in no 20 Entrance Hallway</p>  <p>Source: Heritage Potential Research</p>
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8. Summary

- 8.1. The subject of this application assessment is Kelley House, 18-20 Royal College Street, London NW1 0TH.
- 8.2. Key components of the investigation included historical research, archival study, planning history research, site inspection, assessment of the significance of the heritage asset, and the impact assessment of the proposed remedial and the retrospective works. The planning and heritage assessment for the property involved an in-depth analysis of both pre-2023 LBC and post-2023 LBC alterations.
- 8.3. The property has been extensively altered and extended in the last 40 years to allow for its use as a bail hostel and has been vacant for many years. Upon purchase by the current owners, the property lacked much of its original fabric, all the interiors were in poor condition and in need of an overall refurbishment.
- 8.4. Specifically, very little of the original architectural details were preserved, including doors and architraves, cornices, skirting boards. All original interior features had previously been replaced with plain, off the shelf modern features of a design incongruous with the age and character of the listed building.
- 8.5. It is considered that the points raised above demonstrate clearly why the application proposals will not result in harm to the listed building and would therefore not engage Paragraph 207 or 208 of the NPPF. They would comply with policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017. The detailed overview of the policies and guidance pertinent to the proposals is incorporated in Section 5 of this Statement.
- 8.6. Cumulatively, therefore, the proposed remedial works can be seen to possess a number of planning and heritage benefits which are advantageous to the preservation and enjoyment of this historic building.
- 8.7. The proposed remedial works will introduce the following benefits:
 - The works consist of numerous works that cumulatively have brought the two buildings back to a standard where they can be occupied, which is a considerable step towards securing their long term conservation.
 - The proposals include a well-designed replica of the original staircase at all levels, offering a heritage benefit compared to the previous arrangement, which featured crude alterations, mismatched styles and an overall poor condition of the staircases.
 - The proposals will secure a coherent and historically legible plan form throughout the two properties, that is also respectful of any remaining interior features, including the chimney breasts.
 - The removal of the opening on the ground floor between the properties will result in a heritage benefit by reinstating the original floor layout.
 - A well-designed replica of the original interior architectural details at all levels offers a heritage benefit compared to the pre-existing arrangement, which featured crude alterations, mismatched styles and an overall poor condition of those details.
 - The proposals will re-activate the ground floor lightwells through a sensitive interpretation of French doors, that allow access to these newly proposed amenity areas.
 - All associated plant will be rationalised within a single external structure, that is well screened and of a simple, honest design.
- 8.8. It has also been emphasised that the building had a period of vacancy since its last use as a bail and probation hostel, followed by the client purchasing the property in December 2022. The proposed works will enable the re-occupation of both buildings on all floor levels, ensuring their long-term use and preservation. Therefore, these works must also be emphasised as a public benefit.
- 8.9. As a result, the heritage and the public benefits will outweigh any harm that might be identified as a result of the proposals to mitigate the previously unauthorised works.
- 8.10. The proposals are considered heritage led, have benefitted from extensive pre-application engagement and have been demonstrated to be fully policy compliant. There should be no planning or heritage grounds to refuse the planning and LBC applications.