



Date: 11/11/2024
Our ref: 2024/4072/PRE
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Dear Lucy,

Proposal

High Holborn 207, 2024/4072/PRE “Alterations to listed building”

This advice is based on the documents submitted and on the site visit.

Site description and significance

The site is a grade-II-listed terraced corner townhouse, now above a shop. It makes a positive contribution to the Bloomsbury Conservation Area.

The building was listed on 15 January 1973. The list description describes it as a “terraced house and shop. C19 earlier. Yellow stock brick with stucco cornice and blocking course. Plain stucco 3rd floor sill band. 5 storeys 2 windows with 4-window right return, some blocked. Wooden shopfront with entablature with iron cresting flanked by consoles. Altered shop window, with large panes. House doorway at return with pilasters carrying entablature. Architraved sash windows with original glazing bars, the 2 above the shopfront having consoles carrying projecting cornices. INTERIOR: not inspected.”

Contrary to this, the heritage statement concludes that the house was in fact built in 1847 following structural problems.

The key elements of the house’s significance include its architectural design and materials, evidential value as a 19th-century house, its historic fabric and plan-form, and its townscape contribution, including its strongly positive contribution to the character and appearance of the Bloomsbury Conservation Area and the setting of the adjoining grade-II*-listed pub and the grade-II-listed 1904 office building opposite.

The optimum viable use of the application site is as a domestic dwelling (the purpose for which it was built, and the use in which it currently exists).

Terms of this assessment

The assessment of the proposed works is applied to the impact on the significance of the listed building and the character and appearance of the conservation area. The principle of the roof works is covered first, then works to the stairs, the external works, followed by

the internal works. This advice does not include an assessment of any planning matters outside of listed building consent and heritage impact.

The proposed works are extensive in scope. If this advice fails to mention or assess any aspect of the proposals it should not be taken to mean that such elements are acceptable.

Enforcement history

The site has been the subject of two enforcement actions regarding the development of the roof as an outside amenity space, EN13/0624 and EN23/0414. In each case, an area of amenity space had been built at roof level, accessed by a stair structure. As part of EN23/0414, pre-application advice was sought (2022/4305/PRE) resulting in the house's present condition.

The proposal

The application can be divided into the following components:

- a) The roof garden and lantern.
- b) Demolition and replacement of staircases.
- c) External works
- d) Internal works.

Comments

a) Roof garden and lantern

The proposed lantern would have walkways formed from metal grilles in front of and behind it. To the south, approximately 50% by height of the pitched roof, including the top of the southern truss, would be removed and replaced with a deck containing furniture and plants.

The house's traditional roof form is a component that it is considered important to retain. Such a significant alteration would therefore be harmful to the house's special interest. A roof garden is an inappropriate and atypical feature for a house of this type. It would therefore be harmful to plan form. It would require the demolition of the apex of part of the roof, thus being harmful to historic fabric. Its presence would be visible from surrounding properties, diminishing the historic and traditional character of the house. Whatever the intentions of the applicants, it is probable that future owners would add parasols and other items that would be visible from ground level and surrounding buildings advertising the presence of this inappropriate feature.

The roof lantern would be a large structure, akin to a conservatory, considerably taller than the existing functional access box. While lanterns can form parts of roofs of historic houses, they do not generally rise from the ridges and slopes of pitched roofs. Furthermore, this house does not have a lantern, and has never had one. Here, the lantern would be an access device, so would be tall and visually prominent, and it would be impossible to prevent it from being illuminated at night, along with the terrace, increasing its prominence. The terrace created would be likely to require safeguarding compliant with building regulations.

While green roofs are a desirable component of flat-roofed new-build structures, their benefits are not considered to outweigh harm to listed buildings. Here the addition of approximately 5m² of rooftop planters is not considered "a significant increase in bio-

diversity". The additional structural work allowing a roof structure to become loadbearing and support the weight of planters, etc, would be likely statutorily to require strengthening works in the roof below, causing further harm to fabric.

This part of the proposal would not be supported by the Conservation Team.

In terms of neighbouring amenity, an assessment would need to be made as to the likelihood of nuisance to surrounding dwellings via a planning application.

b) Renewal of staircases

The applicant wishes to demolish and re-provide staircases on the second, third and fourth floors, and carry out alterations to bannisters elsewhere.

Justification for this relies heavily upon the heritage statement.

The listing gives the house's date as "C19 earlier", presumably being based upon Crown Estate documents of 1815. However, the heritage statement explains that it was demolished and rebuilt in about 1847. That a house could need demolishing just 32 years into its life is notable.

It appears from the heritage statement that, for a considerable period after this rebuilding, the house was occupied (separately) by four families and their servants, that is to say, it was built as and in use as a family house above a small business. In 1871, 14 years after this rebuild, it is described as being occupied by a family of five with four servants – presumably in its entirety.

Yet, in section 4, the heritage statement states that the floor-to-ceiling heights are a result of "the original use of the building", which is now argued to have been commercial.

It notes that "the building was purpose built for commercial use, with a shop at ground floor level, and associated commercial and residential space over the upper floors".

In the Values and Significance section, the house's original four or five decades of domestic use are omitted; "[the building] does provide evidence of a building *purpose built for commercial and ancillary uses and for a particular trade/business*, with features such as the goods lift (long since removed) and floor hatches reflecting its origins." "*The building was originally built for pawnbroking business and was in this use and as a jewellers until the 1980s. The building and its associated businesses were therefore a longstanding feature of the area and a small but interesting element in its history.*" "the front façade to High Holborn is very tall and narrow and has a rather unusual sense of scale and proportion, which *may reflect its original commercial use.*" (officer's italics)

It is not denied that alterations appear to have occurred to the staircases over the history of the house. Nor is it disputed that the house spent parts of its life in commercial use. But the assertion that the entire house was built as commercial premises, and so had an identical staircase throughout, which should now be restored, does not appear to be borne out by the evidence provided.

What evidence there is shows that, at the time it was rebuilt, and for decades afterwards, it had families living in it in the traditional fashion, probably with staircases that became increasingly narrow and austere with elevation.

None of the planning history given in the documents indicates that the newer staircases are very modern. The suggestions that “although not recorded, it is understood that the Shaplands undertook alterations to the existing building”, and “the partitions to the stairwell have tongue and groove panelling which is more characteristic of the later 19th or earlier 20th century”, do not, unfortunately, outweigh the presumption of retention of the existing condition, and the demolition and replacement of the existing staircases does not appear to have been justified by the thorough analysis of historic documents.

Justifications given in the design & access statement are: that the non-original staircases have caused alterations to plan form by causing a wall to have been shifted; that the staircases are not consistent; and that the staircases are steep and/or narrow. There is also mention made of fire compartmentation. The D&A states, without apparent sources, that the second-floor stairs date from the late 19th century and were much altered in 1977; the third-floor stairs are said to date from 1900, again without an apparent source.

It is assumed that the D&A is taking its dates from the heritage statement. However, this was unable to pin down the dates of later works to the house, simply noting that works might or might not have been done in 1977.

The drawings assert that the staircases to be removed are comparatively modern, being from either 1890-1910 (3rd floor), or 1977 (2nd floor) – this presumably as part of the Shaplands’ possible works. The fourth-floor staircase is said to date from the unauthorised works of 2008.

As stated above, it is usual for staircases to be different at different levels of older houses. They usually become narrower, plainer and steeper the nearer the top they are. This appears to be the case in this house. Certainly, the third-floor stairs to the attic would be expected to be narrow, plain and steep. There would have been no stairs at all to the roof. This means that the applicant’s ambition to have a staircase of consistent going and design climbing from the front door to the roof is therefore unlikely to be returning the house to its original historic form, even if conservation theory allowed that that was a desirable outcome.

The removal of the fourth-floor staircase is likely to be acceptable. However, its replacement with a staircase matching those at first- and second-floor levels is not, as it would harm the legible hierarchy of the house. Historically, the access from the attic to the roof would have been a ladder.

There is no requirement to modernise listed buildings to keep them in step with ever more stringent regulatory regimes, such as the Building Regulations. On the other hand, allowing alterations can trigger such requirements. It is likely to be impossible to bring the house to the kind of level of fire safety that modern regulations stipulate. Less radical measures should therefore be considered, such as detection equipment and alarms, along with upgrades using Envirograf.

The removal of former features, such as trap door hatches on the third floor, would self-evidently erase the history of the house and its use in various businesses. Such proposals will therefore be carefully considered.

The stairwell riser is said formerly to have contained a dumb waiter, of which fragments appear to survive. However, its significant demolition is proposed at every level. If, as the heritage statement says, the house is a purpose-built commercial building, this can be assumed to be an original feature of 1847. It certainly appears to contain historic fabric, and this will need detailed consideration by officers, possibly including opening-up. If it is historic, its wholesale removal, to accommodate the enlarged staircases is unlikely to be acceptable.

More modest local interventions, such as the reinstatement of appropriate newel posts, might be acceptable, subject to justification.

c) External works

In addition to the works to the roof, the applicant wishes to replace windows at fourth-floor level with copies of those below. This might be acceptable subject to detail and an absence of loss of historic fabric.

A blind window on the first floor is shown to be opened on the Newton Street elevation drawing (but not the plan). This window appears already to have been blind in the pair of historic photographs supplied, apparently dated 1891. This suggests that the “infill brickwork” could be 130-year-old historic material. Alterations to the external elevations will be scrutinized carefully.

It is proposed to replace the front door with one of more period appropriate design. The front door is said to date from 2008, without apparent sources. The replacement of existing historic fabric with older historic fabric is a work of restoration which will have to be assessed on its merits.

d) Internal works

The applicant asserts that many finishes and decorative schemes are both non-original and anachronistic, and proposes to insert replica cornices. Removal of plasterboard and planted-on décor, for example, is likely to be acceptable where it can be shown that no historic fabric is lost. However, this will need to be demonstrated case by case. For restoration to be acceptable, it needs accurately to obey hierarchical principles.

The alteration of the doorway on the first floor will need to be justified.

It is also proposed to level the floors and carry out unspecified works to floorboards. These works have the capacity to “modernise” the house to a harmful degree, so will be scrutinized carefully. Potentially less harmful additive measures, such as overlaid laminate, may nonetheless affect surrounding fittings, such as skirting boards and doors. As noted at Staircases, the patination of the floors tells the story of the incarnations of the building and their restoration is not of itself considered a benefit, while the boards themselves are likely to be considered historic fabric.

Insulation in listed buildings is a developing situation. Internal wall insulation and slim double glazing will be assessed on a case-by-case basis.

Summary

The proposal does not appear to offer any heritage benefits which might be weighed against its harms. Where rooms have already been subdivided, for instance, they remain so (with the exception of room 3.2). Restoration, as opposed to conservation, is not considered beneficial. The non-heritage benefits (providing a small amount of rooftop greenery and beehives) are not considered to outweigh the harm caused by their provision.

The works to the roof would be likely to be considered harmful even were the house not a listed building. They are therefore likely to be resisted. If an application is made, however, the external works -- roof terrace, access structure, alteration to the forms of the front door, the windows and the blind window -- would additionally require planning permission.

Many of the works appear aimed at restoring the building to an ideal past form, removing later alterations and overlays. This is particularly applicable to the stairs, windows and front door. Such ambitions were condemned by Morris, Webb and others in 1877 in the *SPAB Manifesto*, which remains the foundation of modern conservation theory. Yet this project of restoration does not extend to undesirable features, such as the hierarchy of the staircases or the missing attic ceilings. Therefore, while works of replacement of fabric might be acceptable on a case-by-case basis, it should not be expected that the proposal as a whole is considered acceptable simply because it might be argued to be restorative.

Given the large amount of change that is proposed, across five storeys, and the complexity of the justifications required, should an application come forward, it would certainly be worth the applicant's breaking the works down into several simpler applications. This would allow the full exploration of complicated and detailed arguments. For example, merely closely examining a staircase when its demolition is envisaged, could reasonably take up an entire site visit.

Listed building consent application information

Should you choose to submit a listed building consent application -- or series thereof -- which addresses the outstanding issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – listed building consent application
- An Ordnance Survey-based location plan at 1:1250 scale denoting the application site in red
- Plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section and elevation drawings (where existing and as proposed) of any window and joinery alterations at an appropriate scale
- Design & access statement
- Heritage statement
- The appropriate fee
- Please see supporting information for planning applications for more information.

On the basis of the works shown in the pre-application documents planning permission will also be required.

We are legally required to consult the public about applications with individuals who may be affected by the proposals and for all external works to a GII listed building. We would put up a notice on or near the site and advertise in a local newspaper. The council must allow 21 days from the consultation start date for responses to be received. You are advised to contact your neighbours prior to submission, to discuss the proposals.

The proposal would also be put before Bloomsbury CAAC, the Georgian Group and the Victorian Society. Certain works to listed buildings, including the demolition of staircases, require the consultation of Historic England.

Non-major applications are typically determined under delegated powers, however, if more than three objections from neighbours or an objection from a local or national amenity group is received the application will be referred to the Members Briefing Panel (should it be recommended for approval by officers).

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and is not binding upon the council.

Please contact me if you require additional information.

Kind regards,

Nick Baxter

Senior Conservation Officer