



JON LOWE
HERITAGE

Heritage Statement

8 Guilford Street, Bloomsbury,
WC1N 1DA

On behalf of DCCM Fashion Limited

February 2025 | Project Ref. 00490 | V.1





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Heritage Statement 8 Guilford Street, London

Report Version: V1

Project Reference: 00490

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Introduction

1. This Heritage Statement has been prepared by Jon Lowe Heritage Ltd under instruction from DCCM Fashion Limited. It supports listed building consent and planning applications for proposed works to 8 Guilford Street.
2. 8 Guilford Street was built as a residential property but has been in a variety of non-residential uses for many years. Applications for a part change of use and a series of internal and external alterations were granted in July 2024 (2023/4236/P and 2023/4410/L). After a subsequent pre-application process to assess options for the siting of plant equipment, it is now proposed to install plant within the front lightwell at lower ground floor level and on the 2nd floor flat roof, behind a false mansard. Constructed c.1795, the property is Grade II listed and lies within the Bloomsbury Conservation Area.
3. This report presents Camden Council, the decision makers, with a statement of significance on the heritage assets potentially affected by the proposed works applied for, together with an assessment of the impacts and effects of the works upon that significance. In doing so it supports the statutory obligation on decision-makers to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas and to have special regard to the desirability of preserving listed buildings and their settings.

Proposed Scheme

4. It is proposed to remove the property's existing gas boiler and introduce an Air Source Heat Pump in line with the previous consent's Planning Condition 5. A number of locations for this equipment were presented at pre-app and following feedback received from Camden

Council, it is proposed to install the plant equipment in two locations. The plant relating to the commercial unit is proposed to be installed within the basement lightwell, while the plant relating to the residential unit is proposed to be installed on the flat 2nd floor roof behind a false mansard. A small number of minor internal alterations to the consented scheme are also proposed. These proposed changes are detailed within this application's associated Design & Access Statement, which should be read in conjunction with this document.

Methodology

5. The Site, its relationship to context and the wider area have been observed by the author during site visits conducted in April 2023. The findings have informed design development.
6. Value judgements based on observation of the building fabric, form and features were made and these were further supported by documentary research. Observations and external inspections were also undertaken to better identify the overall sensitivity of the building and site to change, together with opportunities for enhancement. Working with the design team, proposals that seek provision of improved and heritage sensitive residential accommodation are presented.

Report Structure

7. This report presents a summary understanding of the application site and surrounding heritage assets, including a description of their historic background. This is followed by a proportionate description of the significance of the heritage assets potentially affected by the proposals. This is followed by an initial assessment of the proposed changes and their impact upon the significance of the heritage assets.



Figure 1: Aerial view of 8 Guilford Street, shaded red, and environs.



Understanding the Site

Understanding the Site

8 Guilford Street

8. 8 Guilford Street is a corner property comprising three main storeys with lower ground floor and mansard levels. Originally two separate residential properties, the land upon which the property sits formed part of the Foundling Hospital and Doughty Estates, which were developed in the late 18th centuries.
9. Whilst originally built for single-family use, the property has been in commercial or boarding uses since at least the early years of the 20th century. These alterations in use have resulted in many changes to the building's internal plan form and decorative fabric, and some of these changes have reduced its sensitivity to change.
10. 8 Guilford Street was listed at Grade II as a group with Nos.9-10 on 14th May 1974 (List Entry Number 1245855). Their list entry reads as follows:

Terrace of 4 houses. c1792-1800, altered. No.8: multi-coloured stock brick with later patching. Stucco ground floor and 1st floor sill band. Corner block with slated mansard roof with dormers. Formerly 2 residences with 3 windows each and 3 window return to Doughty Street. 3 storeys, attic and basements. Slightly projecting C20 portico with Ionic pilasters carrying entablature. C20 radial fanlight and panelled door. Architraved ground floor windows. Upper storey with reddened gauged brick flat arches to recessed 2-pane sashes. Stone cornice and blocking course. Nos 9 & 10: multi-coloured stock brick. Slated mansard roofs with dormers. 3 storeys, attics and basements. 3 windows each. Round-arched doorways with pilaster-jambes carrying cornice heads; fanlights and panelled doors. Stucco 1st floor sill band. Reddened gauged brick flat arches to

recessed sashes; No.9, 2-pane and with cast-iron balconies to 1st floor. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas of Nos 9 and 10. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: -1952: 32).

Location and Context

11. No.8 is located at the corner of Guilford Street and Doughty Street. Surrounding streets are predominantly residential in character although now support a variety of uses. There is a clear street hierarchy in the area, which is structured on a grid layout, and the built form of the area is characterised by townhouses built in long terraces with mews to the rear.

Heritage Context

12. The site is located within the Bloomsbury Conservation Area. The conservation area was designated in 1968 and there have been numerous subsequent extensions.
13. 8 Guildford Street lies within the conservation area's sub-area 10, and its character is summarised within the Bloomsbury Conservation Area Appraisal and Management Strategy as follows:

The townhouses along John Street, Doughty Street and Guilford Street are of significance as they are almost complete Georgian streets, lined with terraces. John Street dates from the mid 18th century, whilst Doughty Street and Guilford Street span the late 18th century to the early 19th century. Although later in date, the townhouses are similar in plan form to those in Bedford Row, but are of a smaller scale and footprint. They are constructed from yellow stock brick, the earlier examples with red brick trim and the later examples with stucco detail.

Various designs of doorcases, fanlights and balconies are evident. Doughty Street comprises a mixture of four-storey terraces with basements and three-storey terraces with basements and mansard roofs. All the buildings within the street are grade II listed, with the exception of Dickens' House Museum at No 48, which although architecturally almost identical is listed grade I for historical reasons.

14. By way of its historical and architectural interest and its prominent location, 8 Guilford Street

makes a positive contribution to the streetscape as well as to the character and appearance of the Belgravia Conservation Area although prior adverse changes have diminished its potential contribution.

15. There are a number of listed buildings in close proximity to the site, highlighted by the map in Figure 2. The site's prominent location and position as part of a larger terrace results in it having an important role within the setting of these nearby listed buildings.

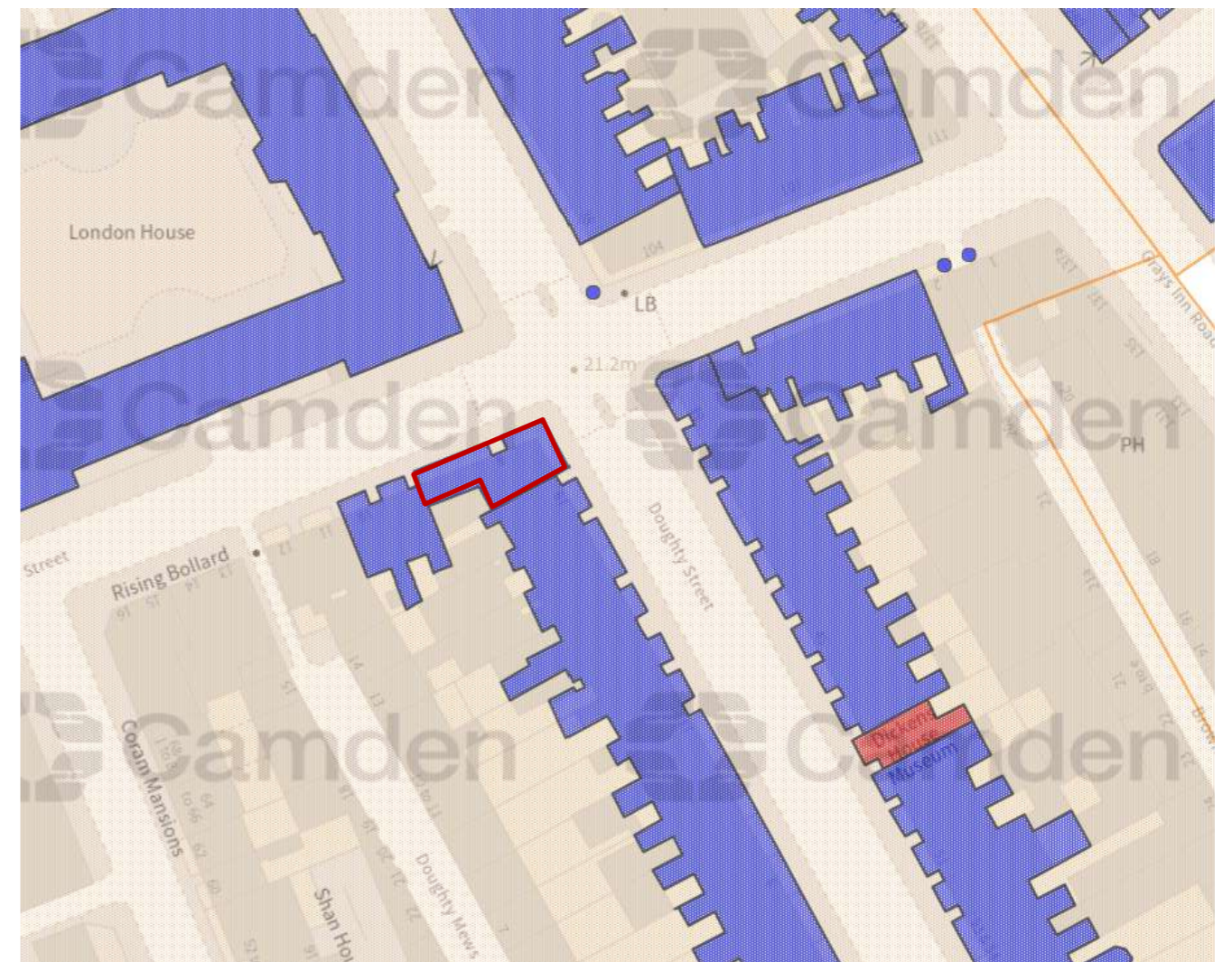
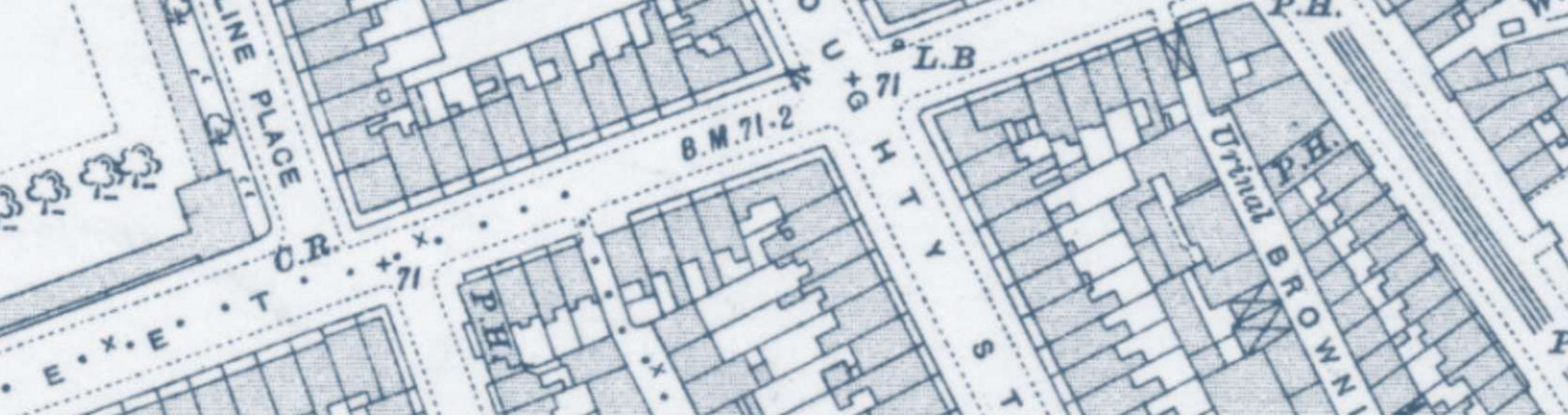


Figure 2: Area plan of 8 Guilford Street, edged in red, and its surroundings. Nearby designated heritage assets denoted by a blue (Grade II listed) and red (Grade I listed) tone. © Camden



Historic Background

Historic Background

Background

16. 8 Guilford Street is in the parish of St Pancras, Camden. Historically, the street formed part of the estate purchased from James Cecil, sixth Earl of Salisbury, by governors of the Foundling Hospital in 1741. The original intention of the governors was to buy two fields to the north of what became Guilford Street, where the Foundling Hospital would be built. However, Lord Salisbury refused to part with such a small site, instead insisting that the governors purchase four fields, a total of 56 acres.
17. The surplus land was disposed of through building leases from 1764, with building accelerating from 1785 when revenue for the hospital dwindled. Development of the land initially proved divisive, with the wealthy residents of Queen Square and Great Ormond Street reluctant to have their rural views spoilt by new houses.

Guilford Street

18. Guilford Street was designed by Samuel Pepys Cockerell (1753-1827) to run parallel with the south wall of the Foundling Hospital, stretching from Russell Square to Gray's Inn Road. The street also formed the northern boundary of the development of the estate. The west end was originally known as Upper Guilford Street, distinguishing the 'better' houses built in this section. These were to include 1st grade houses, with 2nd, 3rd and 4th class houses built in the eastern part of the street. Construction began on the houses from 1794, and rate books show that by 1800 sixty houses were occupied.
19. The Survey of London describes the design of the street and houses:

'Guilford Street presents a combination of houses varying from the first to the fourth class of building, ingeniously designed so that the spectator should pass from end

to end without realizing any obvious change, the divergence being, of course, principally in the dimensions. Houses of the first class at the west end are about 25 to 30 feet wide with spacious entrance halls and the principal rooms on the first floor with three windows reaching to floor level and leading out to the balconies with their decorative ironwork. Above these are two bedroom floors and a servants' attic. As the houses fall in grade towards the east their frontage becomes about 15–20 feet wide and they are only three storeys high. They have no iron balconies and the entrance halls are mere narrow passages. To preserve the uniform appearance of the street a stone string runs in a continuous band throughout its length. The roof lines are, however, varied including slate-fronted mansard roofs exposed above a stone cornice, and also parapets concealing the attic windows. Variety is also introduced in the design of the doors, fanlights and balcony railings.'

Doughty Street

20. Although the address of No.8 is Guilford Street the frontage of the building and its role in the townscape is the terminus of a terrace fronting Doughty Street. The Survey of London states:

'This street runs southwards from the south-east corner of Mecklenburgh Square, crosses Guilford Street and proceeds as far as Roger Street (formerly Henry Street) which divides it from its continuation, John Street. In 1792 Henry Doughty, who had two years before been in touch with the Foundling Hospital building committee, granted leases to Joseph Wigg, carpenter, and George Slaton, builder, to erect six houses on each side of the street southwards from Guilford Street. In 1794 he granted land in



Figure 3: 8 Guilford Street in 1969, prior to the reconstruction of its rear wing at first floor level, and extension up to second floor level.



Figure 4: The same view of 8 Guilford Street today.

Historic Background

the northern part of the street, north of Guilford Street, to George Slaton and John Golden to build three houses on the west and two on the east. These are shown in Horwood's map of London (1799) and included the corner houses. In 1799– 1800 building leases were granted for the completion of the south part of the west side of the street to John Wilson of Princes Street, Bedford Row, George Soward of Tottenham Court Road, Stephen Cosser of Millbank, Westminster, Thomas Curtis of Frith Street, and George Hornby of Great James Street. The south part of the east side of the street was not completed until 1807–09, when leases were granted to John Wilson, Joseph Wigg, John Long of Christ's Hospital, and John Lovell of Red Lion Street. The northern end, which lies in the Foundling Estate, was completed by 1810. The progress of the building is reflected in the rate books of St. Pancras. There were thirteen houses in 1801, forty-two in 1808, and sixty-two (the entire street) in 1820.'

8 Guilford Street

21. 8 Guilford Street appears on Horwood's plan of London, published between 1792 and 1799 (see p.9), but the number is allocated to a building adjacent to the corner plot. The corner plot and adjacent buildings on Doughty Street do not have numbers allocated and this may suggest they were under construction. The revised plan of 1819 shows Doughty Street to have been fully developed and similar arrangement at the Site. The corner building is not numbered.

22. Between 1821 and 1825 John Wotton, surgeon, lived at the property. Solicitors Henry Coode and John Browne occupied No.8 in 1828, remaining there until 1841. Between 1844 and 1849 it was home to Reverend Edward Auriol. In the 1850s, Benjamin Davidson, a Professor of Oriental Language, resided at the house, and by the 1860s Rosette Huguenot was running a boarding house there, with the house appearing to be split into multiple households. It remained a house of relatively high status, with retired army officers, stockbrokers, and surgeons amongst its residents in the 1870s and early 1880s.
23. Towards the end of the 19th century, the house was noted as once again being a 'private house', although it was unoccupied at the time of the 1910 Lloyd George Domesday Survey. The survey notes state that the building would be suitable for a doctor's house, but was in need of modernisation.
24. 8 Guilford Street was once again operating as a boarding house in the 1920s, run by Sidney Edward Dawe. Between 1929 and 1969 however it acted as the offices for the Amalgamated Union of Operative Bakers, Confectioners & Allied Workers, and has remained in institutional or commercial use since.
25. As a consequence of these changes of use, numerous alterations were carried out to the property from the early twentieth century onwards. These are described in the plan comparisons from p.10 onwards.



Figure 5: Ground floor front room within 8 Guilford Street in 1969.



Figure 6: The same room today, note loss of historic fire surround, coving, dado rail, picture rail and skirting.

Historic Background

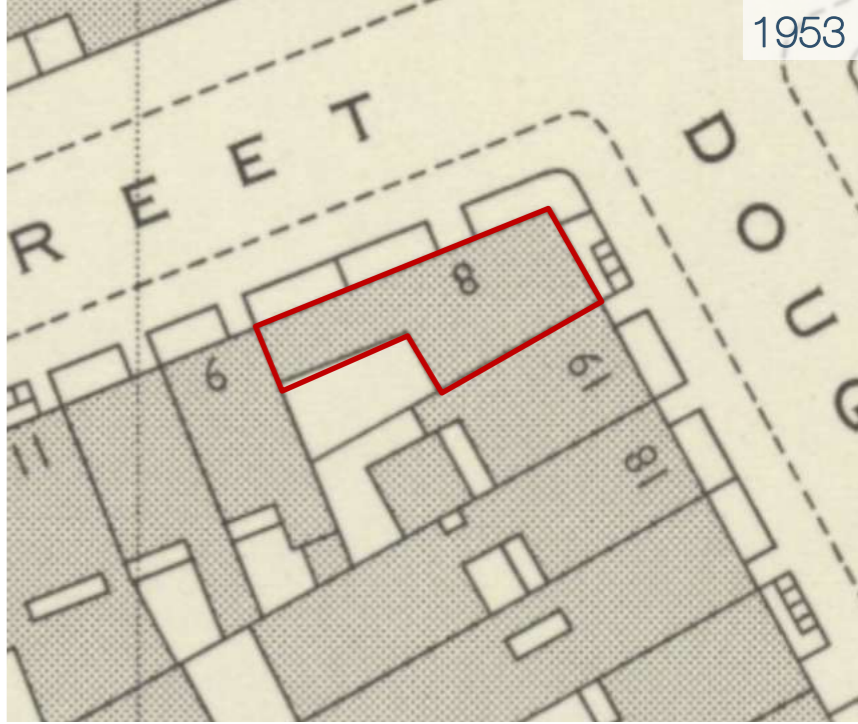
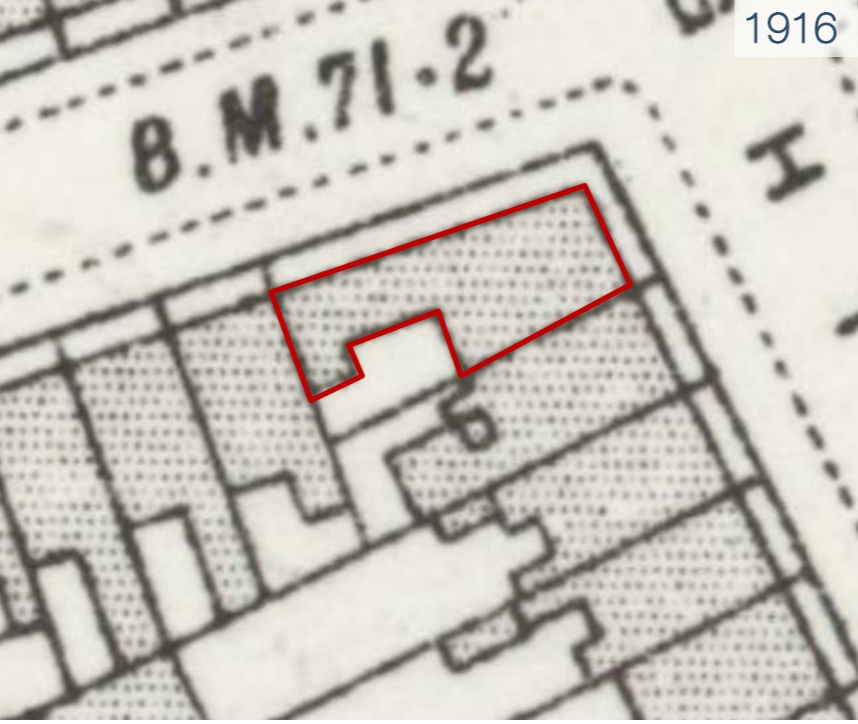
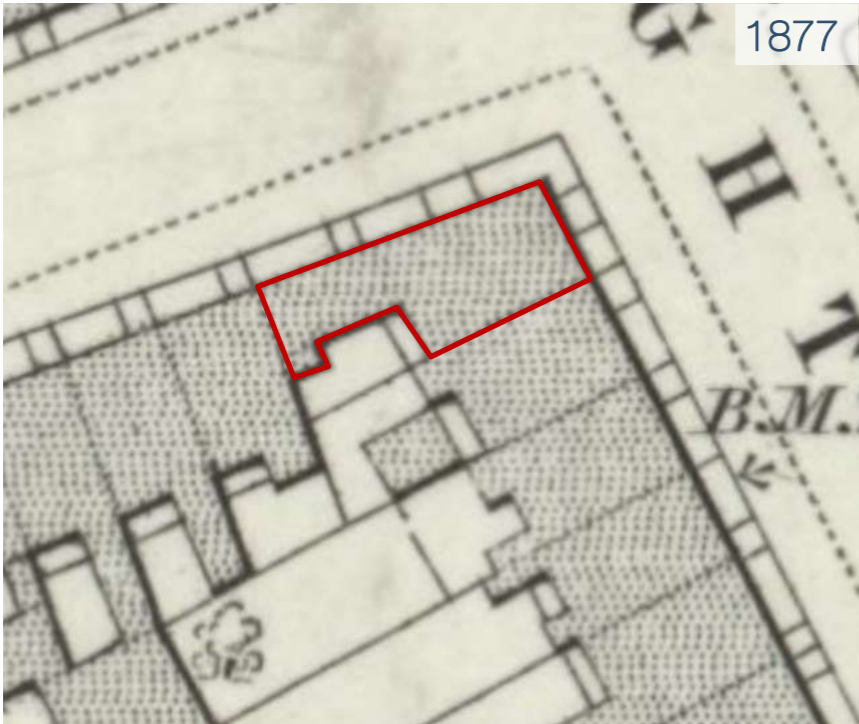
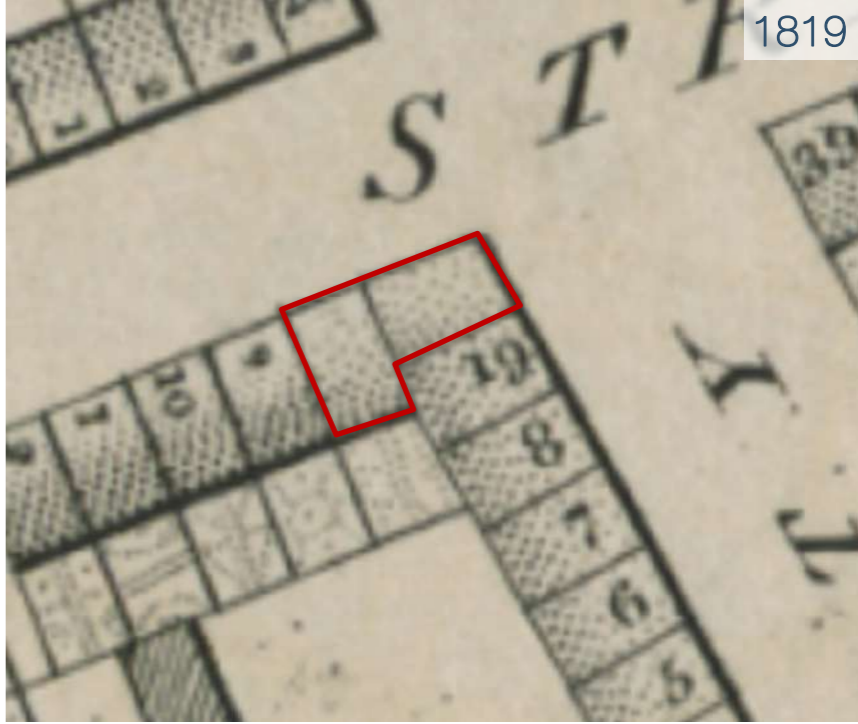
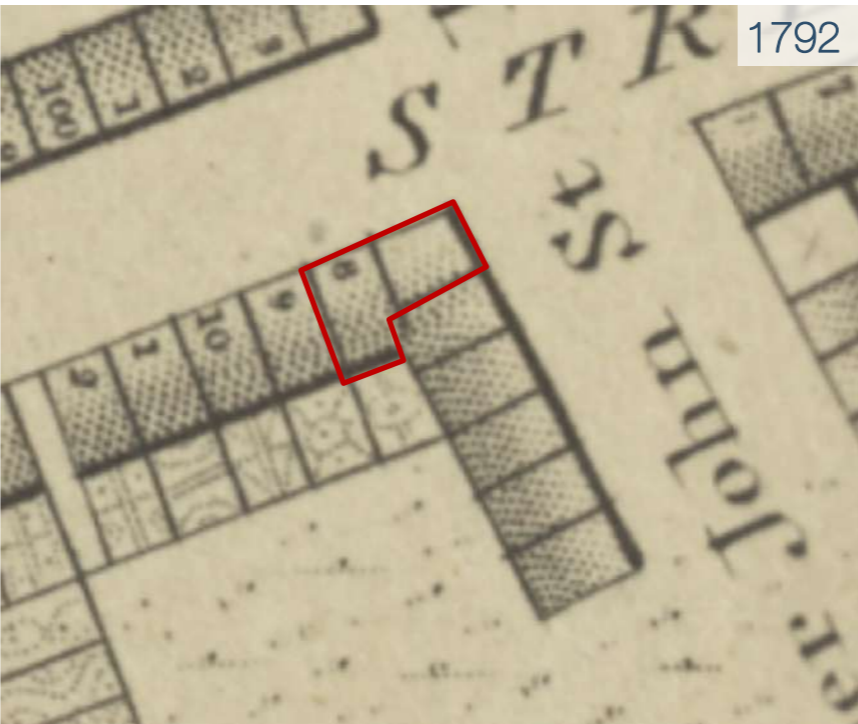


Figure 3: Historic Map Regression. No.8 delineated in red

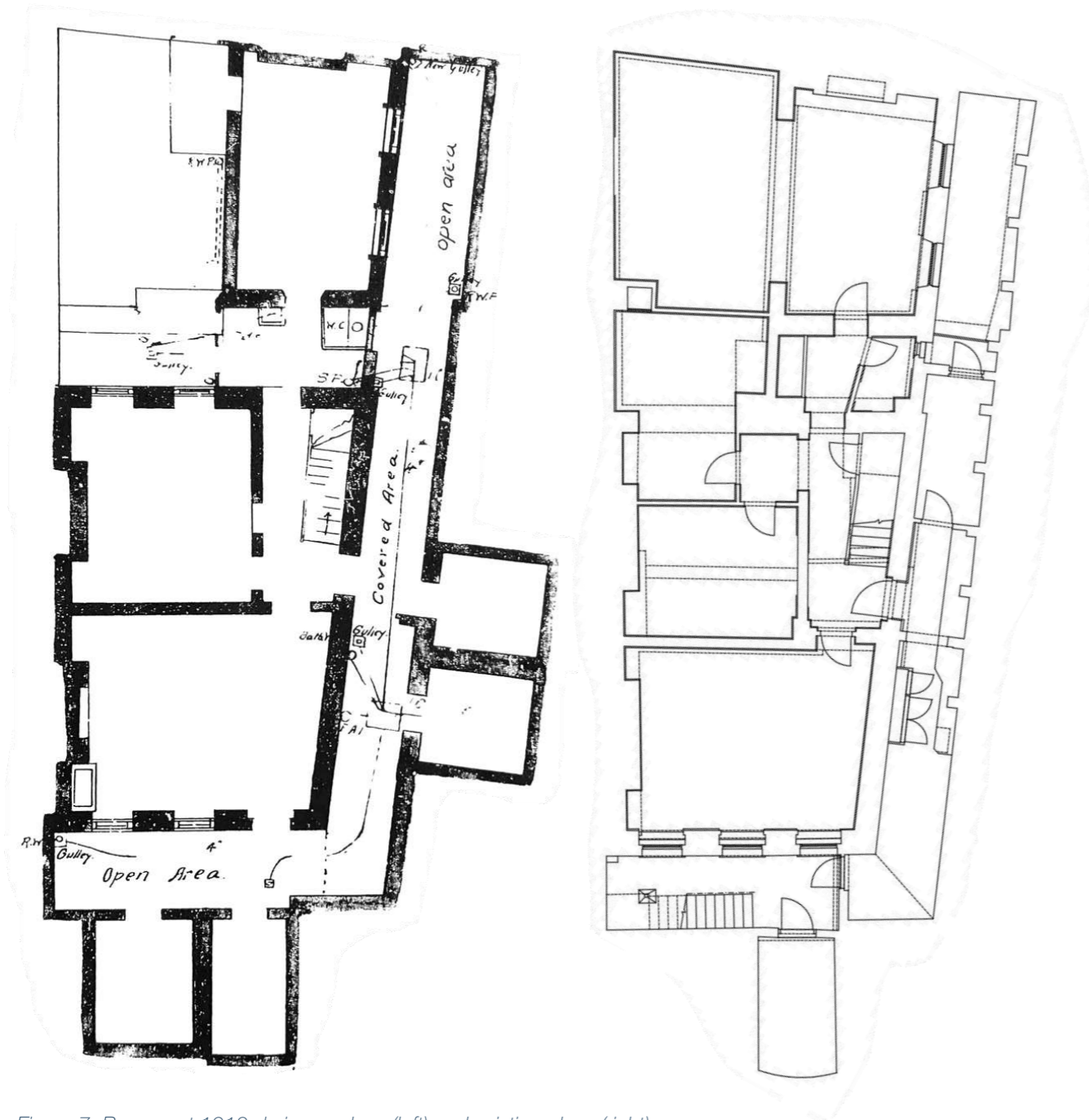


Figure 7: Basement, 1913 drainage plans (left) and existing plans (right).

Comparison of 1913 and existing plans shows considerable change, the most obvious of which is the infilling of the rear yard, which occurred in 1970. This changed the plan form of the basement and significantly increased its size. The rear principal room was subdivided and large sections of wall removed at the rear of the main body of the property and the side of the existing outrigger.

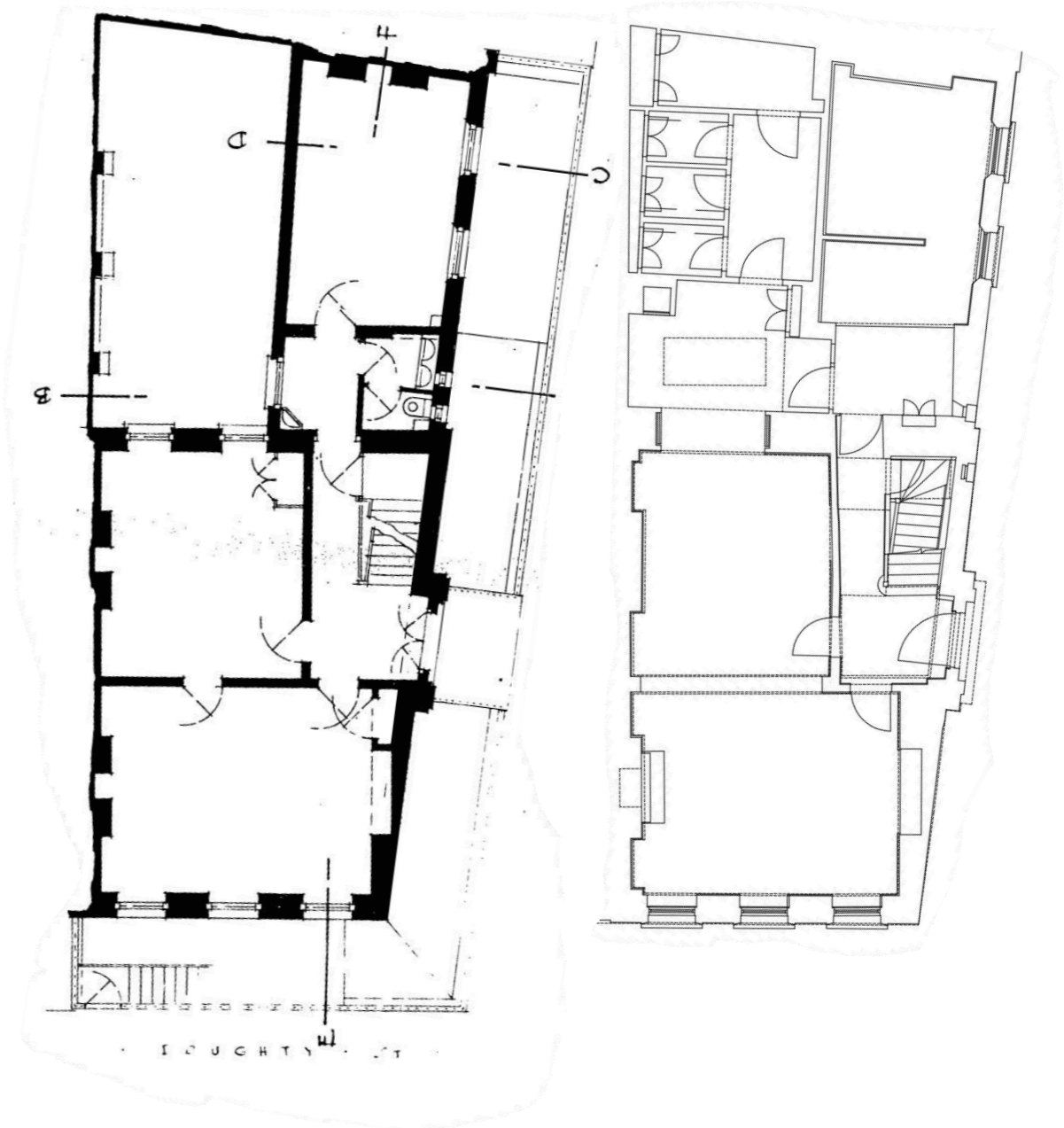


Figure 8: Ground Floor, 1939 drainage plans (left) and existing plans (right).

Comparison of 1939 and existing plans shows a number of changes, primarily to the rear of the property. In 1970 the infill extension to the rear was constructed (as discussed beneath Figure 7, adjacent), and alterations were made at ground floor level to accommodate this considerable change in plan form. Large sections of the property's rear wall was removed to provide access into the new extension. The form of the two principal rooms and stair compartment has remained legible, although the dividing wall between these front and rear rooms was removed to create a larger space.

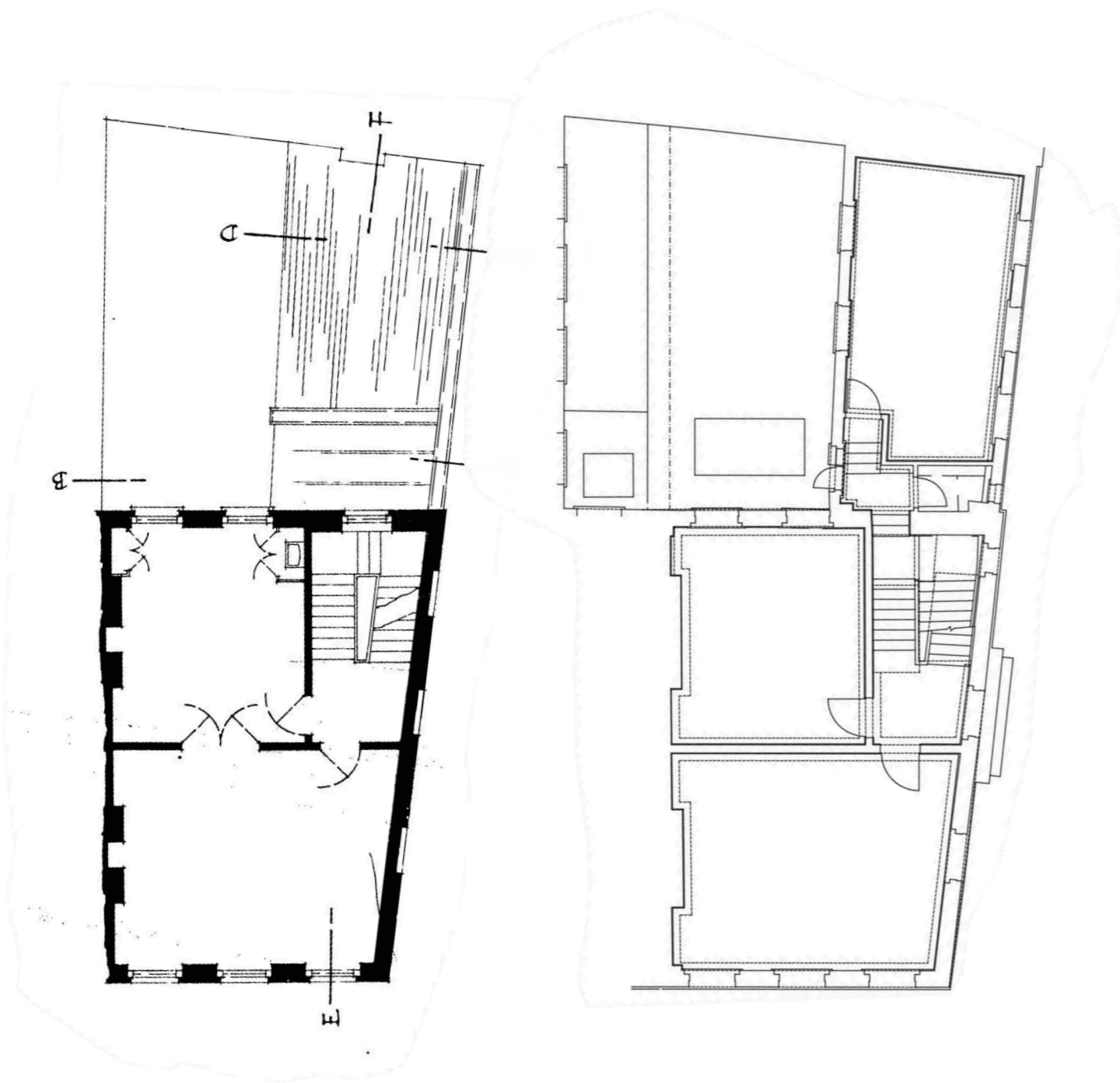


Figure 9: First Floor, 1939 plan (left) and existing plan (right).

The earliest first floor plan we have (dating to 1939) shows that all three Guilford Street-facing windows at first floor level were blind. These windows would not be opened up until 1970. The other primary change that occurred between the 1939 and today was the extension of the rear outrigger—this was raised to first floor level in 1939 (just prior to these plans being drawn up), and at some point post-1970 the double doors between front and rear rooms were blocked.

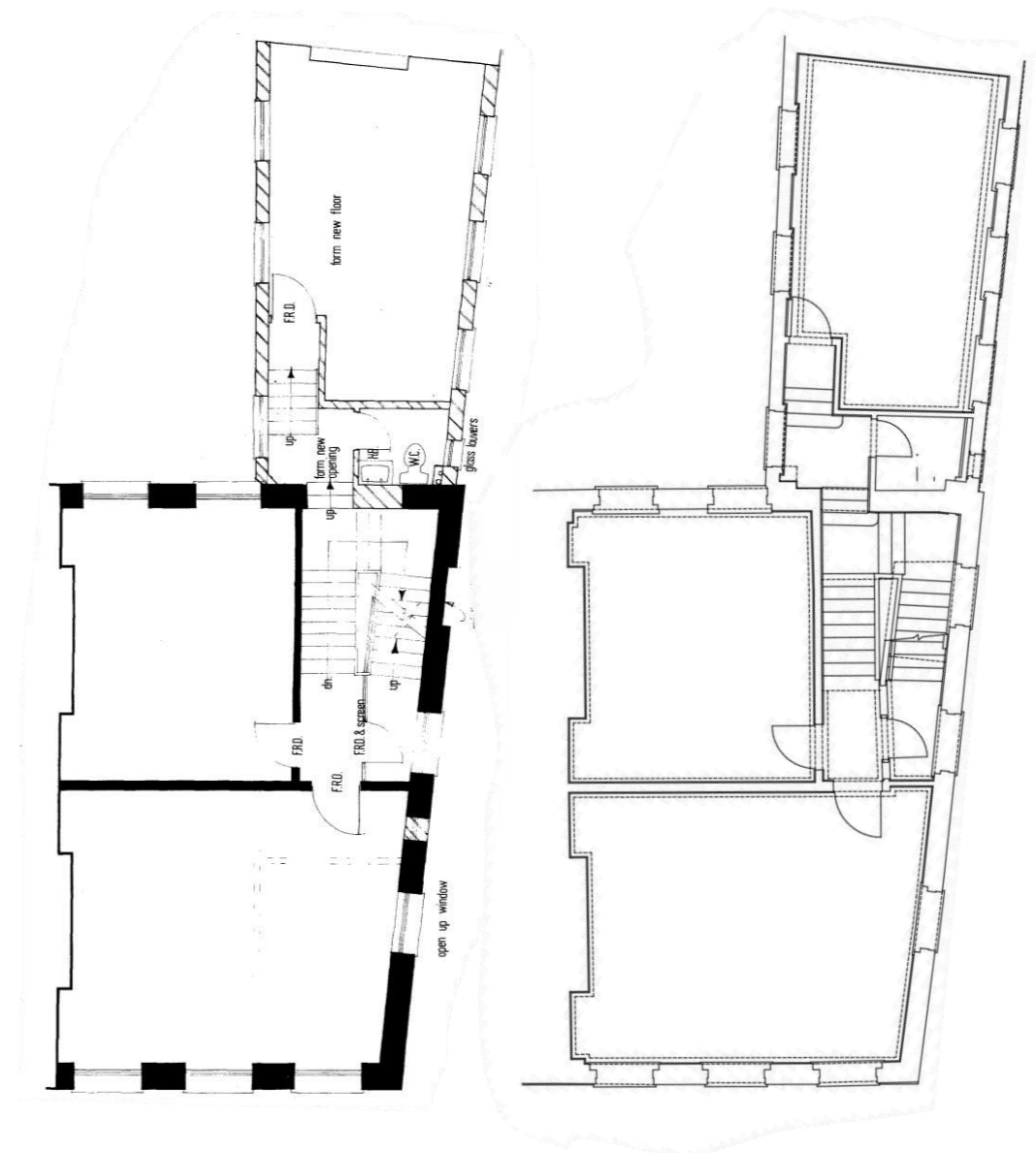


Figure 10: Second Floor, 1970 plan (left) and existing plan (right).

The earliest available plan of the second floor dates to 1970, and shows the proposals to extend the outrigger once again, this time to second floor level. At around this time further dummy windows on the Guilford Street elevation were opened up.

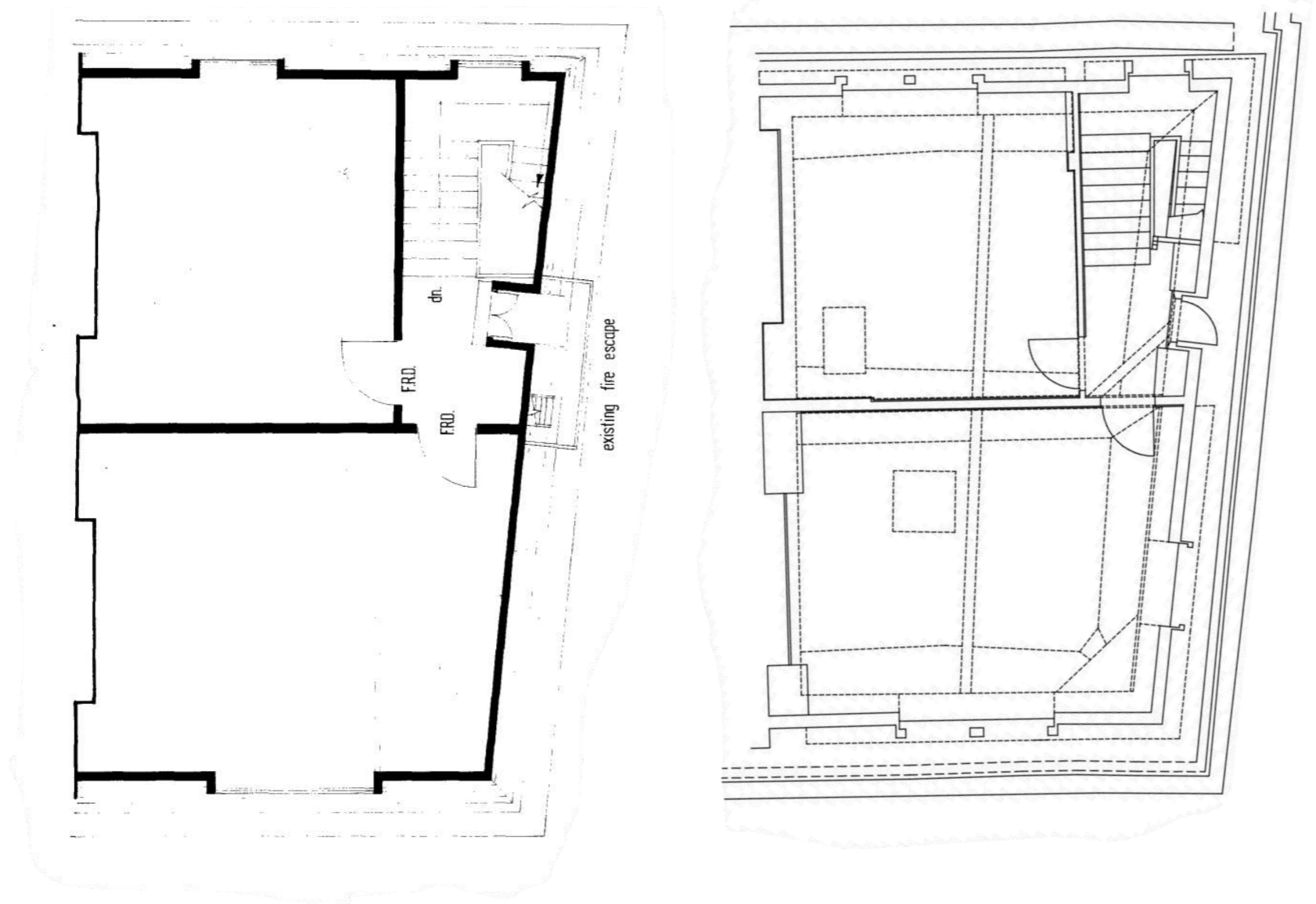


Figure 11: Third Floor, 1970 plan (left) and existing plan (right).

There are no discernible changes to plan form at 3rd floor level between 1970 and today, although it is known that additional dormer windows were added to the mansard prior to 1970.



Figure 12: Guilford Street elevation, 1939 (left) and existing (right).

Although unclear in the 1939 elevation above, at this time all but one of the property's first and second floor windows were blind dummy windows. The central window at second floor level was open at this time, and the others were opened in phases over subsequent years. Other changes include the addition of further dormer windows within the mansard, the extension of the rear outrigger up to second floor level, and the installation of Doric pilasters either side of the entrance door, which occurred in 1970.



Assessment of Significance

Assessment of Significance

26. NPPF policy promotes understanding significance in order to judge the acceptability of the effects of a proposal upon it. Significance, for heritage assets, comprises the asset's architectural, historical, archaeological and artistic interests, and these aspects will be assessed in the following section.
27. Not all aspects of a building are of special interest or desirable to preserve. The proposed scheme will only affect parts of the listed building, whereas the asset's significance derives from the building as a whole and for its townscape qualities and role in an urban plan.
28. A description of the significance of Grade II listed 8 Guilford Street and the character and appearance of the Bloomsbury Conservation Area is presented below. These descriptions are proportionate to the significance of the assets and are sufficient to understand the nature of the impacts the proposed scheme may have upon that significance.

8 Guilford Street

29. 8 Guilford Street has architectural and historic interest and significance. Its interest and significance are not archaeological or artistic.

Architectural Interest

30. **Elevations:** The street-facing elevations (to Guilford Street and Doughty Street) are the property's principal features of architectural interest. Their proportions, hierarchy, materiality and detailing, along with the role these facades play within the planned townscape, all contribute to the building's architectural interest and significance. Some elements of these facades are of lesser interest, such as the rebuilt rear wing along Guilford Street, but they are still in-keeping with the proportions and materiality of the historic proportions of the facades and do not actively detract from them. All but one of the windows on the Guilford Street elevation (not

including the rear outrigger) were historically blind, and were opened up in phases from the 1930s onwards, therefore this elevation does not currently represent its original form and appearance. Windows to both the Guilford and Doughty Street elevations are replacements and have no glazing bars; this has disrupted their proportions and lessened the contribution they make to the interests of these façades and streetscape.

31. The property's rear elevations are stylistically and architecturally subservient and have a more functional appearance. The plain finishes of these secondary elevations illustrates the comparative importance of the frontages as part of the formal townscape. Some elements of these rear elevations are of no interest or diminish significance, for example the plastic skylight within the 20th century basement infill extension.
32. **Plan Form & Proportion:** The primary changes to the building's plan form and proportion are the result of the infill extension at basement level and the addition of the second floor rear wing extension. These changes, along with the removal of the partition between front and rear principal rooms at ground floor level, have had a somewhat detrimental effect on the special interests of the building's plan form. The traditional distinction between the main stair core and the front and rear principal rooms is retained from ground floor upwards, however, and forms an important element of the building's architectural interest.
33. **Decorative Fabric:** Few elements of original and historic decorative fabric survive within the property as a result of its history of commercial and institutional use throughout much of the 20th century. Surviving elements include elements of the main staircase and coricing within the stair core, architraves, and coricing within front and rear principal rooms at first floor level. No original



Figure 13: Basement room of wing



Figure 14: Conjoined basement room in house

Assessment of Significance

fire surrounds remain at any level and at ground floor level, all historic cornicing and skirting has been lost.

34. Extensive losses of historic decorative fabric have lessened the special interests of the property's interior and reduced its sensitivity to change.

Historic Interest

35. The building derives significance from its historic interest. The building is representative of the development of the Foundling Hospital and Doughty Estates in the late 18th century.

Bloomsbury Conservation Area

36. The Bloomsbury Conservation Area is of architectural and historic interest. It covers a significant area of planned urban landscape with a street layout, urban form and architectural character that is distinct and somewhat defining of the period.

37. The area draws significance from its architectural forms and there is a significant degree of consistency. Much of its building stock is residential in form and character, and their relationship to primary and secondary streets, tertiary mews and the focal features of leafy squares, is key to its appearance.

38. In townscape and urban design terms, 8 Guilford street plays an important role as the bookend to a larger terrace along Doughty street, and contributes positively to the character and appearance of the conservation area. The following later changes diminish the contribution:

- Rendered ground floor elevation
- Low quality brick to rear wing extension
- Replacement windows
- Partial infilling of the front lightwell/area
- Loss of original railings
- Change to entrance tiling



Figure 15: Basement room



Figure 16: Ground floor



Figure 17: Ground floor



Figure 18: Entrance hall

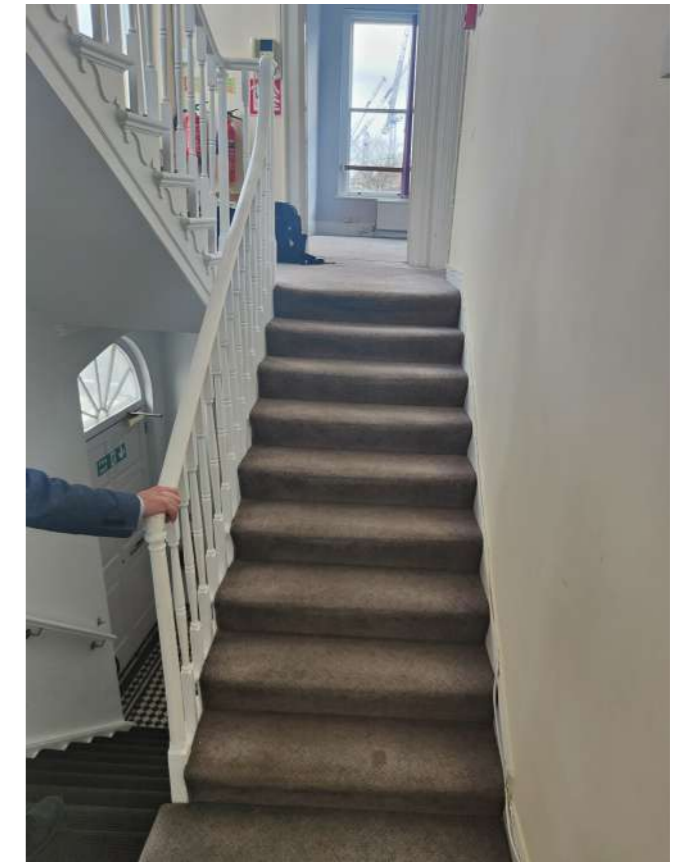


Figure 19: Staircase



Figure 20: Ground floor



Figure 21: Ground floor primary rooms



Figure 22: Ground floor primary rooms



Figure 23: First floor of wing



Figure 24: First floor of house



Figure 25: Second floor of wing



Figure 26: Second floor rear room



Figure 27: Third floor NB ceiling raised and tie beam of truss boxed in.



Figure 28: Third floor



Figure 29: Exterior rear



Figure 30: Exterior rear



Figure 31: Exterior rear



Assessment of Effects

Assessment of Effects

39. The proposals have evolved in consultation with Jon Lowe Heritage Ltd, Historic England and planning officers at Camden Council, in order to avoid or minimise adverse impacts and effects on the listed building and its significance, and to maximise opportunities for enhancement. Consideration is being given to what is desirable to preserve in the interest of achieving these objectives.
40. Full details of the proposals are set out in the accompanying Design and Access Statement and submitted drawings. The impact assessment should be read in conjunction with those documents.

Installation of plant equipment within the basement lightwell and associated changes.

41. It is proposed to install plant for the commercial unit within the basement lightwell. This lightwell is currently partially covered by a roof structure which is of no interest and will be removed. To protect and conceal the plant within the lightwell, a metal grille will be installed above it with bars that prevent views into the lightwell.
42. This option was presented to Camden Council in a pre-application document and received favourable feedback. It provides a discreet solution to the placement of essential but otherwise unsightly plant equipment—this proposal will not adversely impact the character and appearance of the property or the contribution it makes to the conservation area. The grille is a sensitive solution to the concealment of plant within the lightwell that has been used in many comparable properties of this type. This proposal will therefore preserve the special architectural and historic interests of 8 Guilford Street and the contribution it makes to the conservation area and nearby designated and undesignated heritage assets.

Installation of plant equipment on the property's existing flat roof, concealed behind a false mansard.

43. It is proposed to install the residential property's plant equipment on top of the existing 2nd floor flat roof. This option was also presented as an option in the previous pre-application process and received favourable feedback.
44. In order to conceal this plant from view, and as suggested in Camden Council's pre-app feedback, a false mansard will be constructed at the roof's street-facing elevation. This mansard is designed to match the existing adjacent roof and will be slate tiled.
45. This proposal is a sensitive solution to the problem of the placement of essential plant. Mansard roofs are a characteristic feature of buildings along Guilford Street. The 2nd floor of the outrigger on which this proposed false mansard will sit is a later (c.1970s) addition—as such it is no longer read as an outrigger, but as a part of the wider terrace. The installation of a false mansard will therefore not alter any traditional hierarchical relationship between the main house and its outrigger.
46. These proposals will not result in any adverse impacts to historic fabric, and are in keeping with the scale, character and appearance of the property. This proposal will therefore preserve the special architectural and historic interests of 8 Guilford Street and the contribution it makes to the conservation area and nearby designated and undesignated heritage assets.

Minor internal alterations to consented scheme

47. A small number of very minor changes to the consented scheme (internal layout) are also proposed as part of this application. These changes include alterations to bathroom layout and some minor changes to the location of some proposed partitions, and are detailed within this application's associated Design & Access Statement.
48. None of the changes to the proposed plan form of the property in any way increase the proposals' impact on the site's heritage values. As in the approved application, existing traditional cellular plan form is largely retained and there will be no increase in adverse impacts to historic fabric. It is also proposed to repair ceilings throughout the building, and add suspended ceilings to conceal services in some areas. These areas are highlighted in this application's associated Design & Access Statement and are confined largely to bathrooms and rooms within the modern outrigger at the rear. The majority of ceilings within the main body of the property will be retained and repaired as-is. This proposal will therefore preserve the special architectural and historic interests of 8 Guilford Street and the contribution it makes to the conservation area and nearby designated and undesignated heritage assets.

Proposals relating to building facades including repair and restoration throughout.

49. It is proposed to carry out a number of refurbishments and restorations on the property's exterior. The existing roof will be repaired and damaged slates will be replaced with new slates to match. Brickwork will be repaired and repointed, and the rendered cornice will be repaired. Render to the ground floor will also be repaired and repainted using a limewash or breathable paint.

50. The majority of the building's windows will be retained and repaired, with slimline secondary glazing installed internally. Modern dormer windows to front and rear will be replaced by timber sash windows to match existing. At the rear if the outrigger, a mid-to-later 20th century window will be replaced with a slimline double glazed timber unit and the sills on two other windows on the same façade will be dropped to form doors. The glazing in the two outrigger windows closest to the property's main rear façade will be replaced by wired glass in order to conform to fire safety regulations—please see this application's associated Design & Access Statement and fire safety report for more information.
51. The first and second floors of this elevation are entirely modern and date to 1939 and 1970 respectively. These floors and their facades are consequently of neutral interest and these works will not result in the loss of any historic or architecturally significant fabric. These proposals are therefore neutral in impact, and the façade restoration undertaken throughout the building works are wholly positive in impact and will improve the character, appearance and condition of the building as a whole.
52. The contribution it makes to the conservation area and to the setting of nearby designated and undesignated heritage assets would be maintained.



Policy Compliance & Conclusions

Policy Compliance & Conclusions

53. It is considered that the proposed scheme of works will preserve Grade II listed 8 Guilford Street and its special architectural and historic interests. The Character and appearance of the Bloomsbury Conservation Area will also be preserved, thereby according with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
54. In accordance with paragraph 207 of the NPPF (2024) this report provides a proportionate description of the significance of the heritage assets affected by the proposed development. It follows a full inspection and analysis of the building's fabric, along with a study of documentary sources held at public archives. Qualitative judgments have been made based on knowledge and experience of historic buildings of this type within Bloomsbury.
55. The scheme submitted has evolved in consultation with Jon Lowe Heritage Ltd to ensure that opportunities for enhancement are maximized and any impacts are reduced. Our assessment has not identified any harms to the asset's significance.
56. It is an important consideration that the building has been subjected to many phases of invasive and often unsympathetic change, which have removed the vast majority of its historic decorative features and made large changes to its historic plan form. Many of its spaces can therefore comfortably accommodate sensitive change without adversely impacting the building's overall special interests.
57. No adverse impacts to the Bloomsbury Conservation Area have been identified, and the significance of nearby listed buildings would be preserved by the proposals. The following heritage-related public benefits arise from the development, taken as a whole:
 - The securing of the long-term conservation of the listed building through considerable expenditure and investment;
 - Improvements to condition, decorative fabric and quality throughout the building;
 - The returning of part of the building to residential use: a key characteristic of the area.
59. The proposals accord with the relevant policy set out within the London Plan 2021. There is no compromise of local character and the heritage assets affected are conserved. The proposed alterations will allow for the continued and appropriate use of the building.
60. The proposals are considered to comply with Policy D2 of Camden's Local Plan and work in harmony with the key aspects of 8 Guilford Street's character and appearance. The design of the proposed changes has been carefully considered, so as to ensure that the proposals compliment the existing building and have been developed with the building's special interests in mind. The proposals would preserve the building's significance. As such, the scheme accords with Parts I, J and K of Policy D2 within Camden's Local Plan.

Conclusions

61. This report has undertaken an assessment of the significance of the site at 8 Guilford Street and the Bloomsbury Conservation Area. This has been followed by an appraisal of the effects of the proposals on the significance of the heritage assets, with consideration given to local and national policy and guidance.
62. The existing building at 8 Guilford Street is a late 18th century townhouse with modern rear additions. The property has been in commercial office use since the early 20th century and before that served as a boarding house and hotel. These alternative non-residential uses have meant that the property has had to be adapted to accommodate needs relating to these uses, often to the detriment of the building's significance.
63. The proposed development follows successful applications for the refurbishment of the property that would see half of the building remain in office use and half returned to residential use. The proposals presented here offer very minor changes to the consented plan form, alterations to some windows and a sensitive solution to the placement of plant equipment that will allow the property to conform to the previous application's sustainability statement and planning condition 5.
64. The proposals have been assessed against the policy and guidance set out within the NPPF and Camden Council's Local Plan. This assessment concludes that the proposals accord with the policy and guidance and offer sympathetic and informed scheme that will maintain the overall interests of the listed building and street scene.

Appendix 1:

Legislation and Planning Policy

Legislation

- 1) The Planning (Listed Building and Conservation Areas) Act 1990 is the current legislation relating to listed buildings and conservation areas and is a primary consideration.
- 2) In respect of proposals potentially affected listed buildings, Section 66 states that *“in considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*.
- 3) In respect of conservation areas, Section 72 of the Act places a duty on the decision maker to pay special attention to the desirability of preserving or enhancing the character or appearance of the area.

National Planning Policy Framework (revised 2024)

- 4) The Government's planning policies for England are set out within the National Planning Policy Framework (revised 2024). It sets out a framework within which locally prepared plans can be produced. It is a material consideration and relates to planning law, noting that applications are to be determined in accordance with the local plans unless material considerations indicate otherwise.
- 5) Chapter 16, 'Conserving and enhancing the historic environment', is of particular relevance.
- 6) Heritage assets are recognised as being a irreplaceable resource that should be conserved in a manner appropriate to their significance. (Paragraph 202) The conservation of heritage assets in a manner appropriate to their significance is also a core planning principle.
- 7) Conservation (for heritage policy) is defined at annex 2 as: "a process of maintaining and

managing change in a way that sustains and, where appropriate, enhances its significance." It differs from preservation which is the maintenance of something in its current state.

- 8) Significance (for heritage policy) is defined at annex 2 as: "The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting..."
- 9) As a framework for local plans the NPPF, at paragraph 203, directs that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, taking into account four key factors:
 - a. "The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b. The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c. The desirability of new development making a positive contribution to local character and distinctiveness; and
 - d. Opportunities to draw on the contribution made by the historic environment to the character of a place."
- 10) This approach is followed through in decision making with Local Planning Authorities having the responsibility to take account of 'a' as well as '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'. (Paragraph 203)

- 11) Describing the significance of any heritage asset affected, including the contribution made by its setting, is the responsibility of an applicant. Any such assessment should be proportionate to the asset's significance. (Paragraph 207)
- 12) Identifying and assessing the particular significance of any heritage asset potentially affected by a proposal, taking into account evidence and expertise, is the responsibility of the Local Planning Authorities. The purpose of this is to 'avoid or minimize any conflict between the heritage asset's conservation and any aspect of the proposal'. (Paragraph 208)
- 13) In decision making where designated heritage assets are affected, Paragraph 212 places a duty of giving 'great weight' to the asset's conservation when considering the impact of a proposed development, irrespective of the level of harm.
- 14) Heritage Assets are defined in Annex 2 as: "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."
- 15) Harm to designated heritage assets is categorized into 'substantial harm', addressed in Paragraphs 213 and 214 of the NPPF, or 'less than substantial harm', addressed in Paragraphs 215.
- 16) Paragraph 216 of the NPPF states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the

significance of the heritage asset."

- 17) The effects of any development on a heritage asset, whether designated or not, needs to be assessed against its archaeological, architectural, artistic and historic interests as the core elements of the asset's significance.
- 18) The setting of Heritage Assets is defined in Annex 2 of the NPPF as: "

"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."

National Planning Practice Guidance

- 19) National Planning Practice Guidance relating to Chapter 16 of the NPPF was last modified on 24 June 2021.
- 20) In respect of levels of harm paragraph 018 recognises that substantial harm is a high test. Case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset. In cases where harm is found to be less than substantial, a local authority is to weigh that harm against the public benefits of the proposal.
- 21) Proposals can minimise or avoid harm to the significance of a heritage asset and its setting through first understanding significance to identify opportunities and constraints and then informing development proposals.
- 22) A listed building is a building that has been designated because of its special architectural or historic interest and includes the building, any object or structure fixed to the buildings, and any object or structure within the curtilage of the buildings which forms part of the land and has done so since before 1 July 1948. (Paragraph

023)
23) The term 'Special architectural or historic interest' as used in legislation are used to describe all parts of a heritage asset's significance.

24) Paragraph 007 of the NPPG states: *"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."*

25) Paragraph 013 states:

26) "The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each."

London Plan (2021)

26) The London Plan (2021) provides a city wide framework within which individual boroughs must set their local planning policies. It is not a revision but offers a new approach from previous iterations of the London Plan. While policies are generally strategic and of limited relevance the policies relating to the historic environment are detailed within Chapter 7 Heritage and Culture. These have been aligned with the policies set out in the NPPF, key of which is Policy HC1: Heritage Conservation and Growth. This policy

provides an overview of a London wide approach to heritage and in doing so requires local authorities to demonstrate a clear understanding of London's historic environment. It concerns the identification, understanding, conservation, and enhancement of the historic environment and heritage assets, with an aim to improve access to, and the interpretation of, the heritage assets. It states that:

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process

Camden Council's Local Plan

Policy D2 Heritage

27) The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

28) 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.

29) The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

30) Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

31) The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or

appearance of a conservation area;

- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage

Listed Buildings

32) Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Archaeology

33) The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets and non-designated heritage assets

34) The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London