

FAO Mr. Gideon Barnett
28 John Street
London
WC1N 2BL

10th May 2024

Job Ref: Joo4882

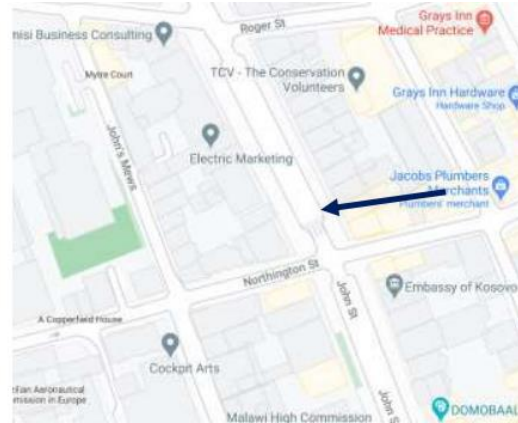
Dear Gideon

Ref: 2023/3562/P & 2023/4947/L - 28 John Street, WC1N 2BL

I write with respect to the above and the recent (undated) Heritage Comments issued in relation to the application site and proposals to refurbish and restore existing vaults; specifically comprising the lowering of the floor combined with new openings for timber doors and timber windows.



28 John Street



Location

Historic Background

The district of Bloomsbury is a mixed-use neighbourhood located in the London Borough of Camden. It is situated to the north of the 17th century area of Soho; to the northeast of Finsbury; to the south of national and international train links in Kings Cross, St. Pancras and Euston; and to the west of Westminster.

The development of Bloomsbury took inspiration from the success of Inigo Jones's Covent Garden (from the 1630s) and his introduction of Palladian architecture into England. Early development includes Bloomsbury Square, which was constructed in 1661 - by the 4th Earl of Southampton – along with terraced housing to the east and west, and Great Russell Street, constructed in 1670.

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CIFA Chartered
Institute for
Archaeologists

IHBC
INSTITUTE OF HISTORIC
BUILDING CONSERVATION



Map of St. Andrews, 1720



Roque's Map, 1746

The mid-18th century map of St. Andrews shows that the area in which the application site now resides remained an open space, whilst to the south of the application site is a garden annotated as the 'Bowling Greens'. There is a dominant east-west thoroughfare illustrated by the map that is annotated as Theobald's Road (subsequently widened in 1877-78). It is also annotated as the Kings Way; presumably because it was 'originally built as a royal route to James I's mansion of Theobalds in Hertfordshire.'

Rocque's Map of 1756 shows that John Street is not yet developed and remains a large garden at this time. The area is nevertheless bisected along an east-west axis by an unnamed street (later referred to as Little James Street on the Harwood Map of 1799). The completion of Bedford Square in 1775-76 subsequently marked the systematic development of the area.



Harwood Map, 1799



Greenwood Map, 1828

John Street is noted by the relevant Conservation Area Appraisal (2011) to date from the mid-18th century. In 1792, twelve houses were built by Henry Doughty, which served to instigate the south end of Guilford Street. A map of 1799 shows the early development of terraced townhouses on John Street. The application site is illustrated as one of the first

buildings constructed to the north of the intersection with Little James Street (now Northington Street).



OS Mapping, 1874-75

By 1800, Bloomsbury was established as a residential area between the cities of Westminster and London. However, it had been developed to accommodate the aspiring middle-class and as such, was not as fashionable as St. James' or Mayfair. Notable developments include Montague Place and Keppel Street developed over 1800 -1810, and Euston Square, from 1800-1805.

The construction of Euston, King's Cross and St. Pancras stations along Bloomsbury's northern border served to further populate the area. By the Victorian period, this was transformed from an inherently *'light and airy'* place to that of a significantly polluted locale. The C19 rise in population also resulted in an increased number of religious buildings in the period.

Much of the locale was built speculatively, albeit a substantial proportion of this development failed to attract buyers. Following the completion of Belsize Park and St. John's Wood, Bloomsbury decreased in desirability as a residential area. As a result, the 19th century saw the widespread emergence of non-residential uses throughout the locale.

Historic mapping from 1828 indicates an increase in growth, wherein John Street is now entirely enclosed by terraced housing. It is categorised as a *'main street'* and a *'secondary thoroughfare'* by the aforementioned Appraisal. The street is distinctively wider than those that surround it, whilst hosting larger properties.

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OS Mapping, 1916



OS Mapping, 1937

The emergence of non-residential uses throughout the locale transformed this into more of a mixed-use area than was originally intended. In the Victorian era, Bloomsbury therefore assumed more of an institutional and/or intellectual emphasis by accommodating institutions such as the British Museum and University College London.



Bomb Damage Map, 1945



OS Mapping, 1952-3

With respect to the application site - as illustrated on the OS Map of 1874-75 - the width of the terrace house is greater than that of its neighbours and there is a long extension running from the rear of the property, which in turn creates a more direct relationship with Little James Street (subsequently Northington Street). Former houses had also begun to be redeveloped as specialist hospitals around Queen Square and Great Ormond Street.

At the turn of the century, the continuing decline of residential usage in the area resulted in the emergence of more commercial development. Purpose-built hotels and offices started to appear, being further boosted by the arrival of the railways. The most notable of these is the Russell Hotel built in 1898 by Charles Fitzroy Doll. The earlier footprint of the application site persisted into the 20th century.

By 1916, the rear of the application site can be seen to have been extended with an adjacent property on Little James Street and there is no longer a garden. At this juncture, no plot boundaries indicate whether or not this property is independent or connected to the application site. In 1937, the same footprint persists and remains as such by 1952-1953.

This OS map sees Little James Street renamed Northington Street, however there are no property numbers. Addresses on Northington Street jump from 14 to 10 and it may therefore be assumed that the extension behind the application site comprises 12 & 10 Northington Street.

In the mid-20th century, Bloomsbury continued to host more institutional usage, in addition to more general redevelopment following the bombing of WWII. Although the application site itself remained unaffected, Bomb Damage mapping evidences the impact of this throughout the locale, specifically in terms of its relationship with Theobald's Road.

A change in building typology is also evident over the mid to late 20th century, when private developers began to erect blocks of flats, as the local authority introduced social housing. In this respect, the area gained international recognition with estates such as the Brunswick Centre and Lasdun Faculty of Education.

Euston Square was developed in the late 1960s as part of the station's redevelopment (only two lodges of the original station survive), although slightly later plans for the expansion of the British Museum and creation of a new British Library were thwarted by considerable local opposition.

The locale of the application site can be seen to have developed considerably since development first began in the 1660s. Notably, the presence of institutions such as UCL, the British Museum, hospitals, and Euston Road have extensively redeveloped numerous former dwellings in order to accommodate institutional functions.

Otherwise, an overarching trend toward redevelopment has persisted up until the present day. As a result, the uniformity envisioned for the area has been subsequently fragmented, whilst institutional and cultural uses have eroded the significance of earlier residential accommodation, which can be now seen to be relatively intermittent.

Whilst the application site has remained a residence and where its original use therefore remains intact, the growth and evolution of wider Bloomsbury can be seen to have been subject to continual change. Neither has 28 John Street remained unaffected by such intensification and this has not merely connected with Northington Street but in its own right, been further subdivided into self-contained apartments.

The Heritage Asset(s)

It is demonstrated above that Bloomsbury is an inherently historic area exhibiting continuous evolution. This would include the immediate surroundings of the application site, which form part of a wider terrace designated Grade II on the 24th of October 1951.

The list description for *Nos. 22-28 John Street with Attached Railings* may be summarised as follows:

'Terrace of 7 houses. c1800-19. Yellow and multi-coloured stock brick with stucco bands at 1st floor levels. Nos 27 & 28 with slated mansard roofs and dormers. 4 storeys and basements; Nos 27 & 28 with attics. 2 windows each; Nos 26 & 27, 3 windows each; No.28 double fronted

with 5 windows. Gauged brick flat arches to recessed sashes, most with glazing bars; 1st floors with castiron balconies, except No.28. Parapets. No.22: square-headed, architraved doorway with patterned rectangular fanlight and panelled door. INTERIOR: noted to retain reeded marble fireplaces on ground and 1st floors. Stairs with square balusters. No.23: similar doorway to No.22. INTERIOR: noted to retain reeded marble fireplaces on 1st and 2nd floors (original centres covered in). No.24: similar doorway to No.22. INTERIOR: noted to retain marble fireplaces with original centres on ground floor. No.25: similar doorway to No.22. INTERIOR: noted to retain marble fireplaces on ground floor. Good marble fireplace 1st floor front room with bas relief on front panel, reeded and with rosettes; original iron centre. Nos 26 & 27: round-arched doorways with reeded doorframes, lion mask stops, mutule cornice-heads, patterned radial fanlights and panelled doors. No.27 with lamp-holder incorporated in fanlight. No.26 with fluted lead rainwater head. No.28: round-arched doorway with attached Doric columns carrying entablature; patterned radial fanlight and panelled door. Cornice and blocking course. Wrought-iron overthrow lampholder. Return to Northington Street with 1 window and mid C19 entrance with stucco surround and console-bracketed cornice. Dentilled cornices. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas.'



The Location of the Heritage Asset (Historic England)

The application site is also located on the eastern edge of *Bloomsbury Conservation Area*, first designated in 1968 to 'protect elements of development from the Georgian and earlier eras.'

However, given the internal/publicly obscure emphasis of works, this designation is not considered relevant to the proposals at hand, and therefore their assessment in relation to the interiors of designated 28 John Street is understood to be sufficient to address the nature and extent of impacts upon the built and/or historic environment of the locale more generally.

As such, the application site can be seen to maintain a number of characteristics recognised as contributing toward the significance of the listed building. For instance, this includes the *'round-arched doorway with attached Doric columns carrying entablature; patterned radial fanlight and panelled door. Cornice and blocking course.'*

However, there is no longer a lamp-holder, whilst some brickwork has patently been rebuilt at upper levels. The list description further omits to note the property's integral and therefore important relationship with Nos. 12-14 Northington Street.

As indicated, the application site was the first of all townhouses presently encompassed by the listing to be completed. This is best demonstrated by the Harwood map of 1799 whilst evidence concerning the completion of this terrace of residences is provided by the Greenwood map of 1828.

By 1875, the OS map shows a small, narrow, rear extension added to the application site of which the south elevation fronts onto Little James Street (now Northington Street). The remainder of the property remained a rear garden. This layout continued intact up until the end of the 19th century.

The aforementioned extension evolved to become a physically attached property, yet one that nevertheless remained independent from No. 28 John Street, being converted to comprise two separate houses. Evidence of this phasing may still be observed on the southwest corner of the application site, where brickwork between ground and first floor - and at second floor level - patently changes.

This is further confirmed by fenestration, where windows to the Northington Street elevation are also later, with arches being cambered rather than of a flat/splayed/gauged configuration.

The application site and adjoining properties have therefore been demonstrably subject to ongoing change that can be seen to have both eroded and impinged upon both the Grade II listed building and its setting; a scenario that is best confirmed by the recent planning history of these properties.

Although in general terms the application site can be seen to accord with the list description and the character and appearance of the locale as this is outlined in the Appraisal, both fabric and documentary evidence make clear that the building has been subject to prolonged periods of alteration since its original construction.

Further to this, the planning history of individual apartments at 28 John Street shows that the former townhouse has been subdivided in recent history. Notable changes include not merely subdivision but also other more peripheral phasing to the rear and/or Northington Street aspect of the site.

Therefore, when considered in totality the site is not without incremental change that is understood to have departed the property from the overarching character, appearance and

significance of the terrace and wider locale. However, its contribution toward the terrace as a whole and the consequent role of this as an architectural set piece is not disputed.

Discussion

As noted, you are now in receipt of undated '*Heritage Comments*' seeking to inform determination of the application. This begins by listing the full complement of heritage assets understood to be relevant to the application and lists not only 28 John Street, but also the conservation area and numerous other Grade II listed buildings located nearby as a matter of setting.

Given the internal/obscure nature of works at 28 John Street, it is established above that only this Grade II designated asset is of relevance to the matter at hand. Public realm views of proposals are not possible and therefore the overriding conservation area and settings of other listed buildings are not considered relevant.

To list these assets in this manner would therefore appear to be an attempt to unduly escalate the sensitivity of the application site and locale with respect to proposals, and in turn, obviously raises questions as regards the more general credibility of the consultation. This then goes on to outline a '*Summary of Significance*' in relation to all aforementioned assets, which again undermines the more general credibility of the consultation.

Although it is acknowledged that the special interest of 28 John Street '*is partly derived from the front façade including its architectural design and elevational hierarchy, as well to the wider composition of John Street*' (see above), the consultation goes on to state that the '*internal plan form, historic fabric and features are also of both architectural and historic interest in demonstrating domestic living arrangements from the early nineteenth century*'. This is again considered something of an exaggeration.

Whilst what remains of original and/or historic plan forms, historic fabric and features is obviously of intrinsically special interest, this is only up to a point and again, in view of the evolution, subdivision and other associated alteration undergone at the site (again, see above), to state that such interest is of value to '*demonstrating domestic living arrangements from the early nineteenth century*' is once more an exaggeration and, given the existing scenario at the site, without much credibility.

That this is the case is further demonstrated by consideration of the '*Special Interest of the Listed Building*' as part of the consultation. Whilst the ostensibly '*unusual*' nature of the double fronted property is again questionable – as established above – a brief if not superficial account of its evolution demonstrates that the intrinsic significance and/or special interest of 28 John Street has been extensively compromised. As such, the consultation finds (at least) that:

'Whilst it was originally built as a house, the ground and basement levels have been separated off to form a flat in 2001. The flat has sole access to the basement lightwell and vaults under the pavement.'

And that, in addition to what is an impinging and erosive evolution more generally:

'Accessed from the front lightwell, there are four arched vaults which extend under the pavement of John Street. Historically these would have been used for the storage, particularly of coal which can be seen with the existence of a small metal coal hole cover in the pavement. Within the building, there was a hierarchy of spaces, with the larger and grander reception spaces being located on the ground and first floor levels. This is reflected in the scale, and head height of the rooms on these levels. Subservient spaces were smaller in scale and located in either the upper floors or basement.'

This is in general terms agreed, although it is again necessary to emphasise that any such hierarchy etc. has been long superseded (most particularly via the later, integral relationship established between 28 John Street and 12-14 Northington Street, to its rear, where each are now integral).

It is equally agreed that spaces *'in either the upper floors or basement'* are *'subservient'*, being utilitarian and of relatively lower importance than *'larger and grander reception spaces being located on the ground and first floor levels'*.

That this is the case would also appear to be the definitive view of the officer, who goes on to write that *'Historically the basement was a more modest space in the building, housing servants and services'*. They go on to - fairly obviously - state that:

'In order to provide natural light to his space a small lightwell was provided which also allowed access to the storage vaults. This approach was an important feature of the terraced house, as it maximised the amount of floor area, but without diminishing from the quality of the living space on the upper floors. Their arched roof form, and dividing walls were a response to the need to support the public pavement above.'

Next, the officer writes that *'In their guidance on Georgian and Victorian terraced housing, Historic England acknowledge that this part of the building provided an important transition zone between the street and the house, providing functional and physical separation and increasing the comfort of the occupants. They also acknowledge basement vaults are an important feature of some types of Georgian and Victorian terraced houses'*.

This is not strictly true and said guidance is not solely referring to basement vaults as an *'important feature of some types of Georgian and Victorian terraced houses'*, but what is termed by the document the lower ground level *'area'*, or lightwell, of which pavement vaults are merely a component part and forward extension.

However, it is important to emphasise at this juncture, that such a configuration and therefore component aspects of the relative hierarchy in evidence at the site (particularly with respect to individual levels), would not unduly or appreciably alter following the implementation of proposals; either visually, physically or evidentially.

And whilst it is true that Historic England's guidance does discuss the importance of basement vaults, what is not noted by the officer is the similarly proffered advice that, with respect to such features, it is accepted that *'Changes can increase capacity of vaults and basements while retaining historic fabric'* (p.10).

Turning next to the *'Impact of Proposals'*, the officer goes on to write that:

'The existing four vaults are separate self contained spaces, with a head height of two metres to the top of the arch. They are accessed through door sized openings off the front lightwell. Originally they would have had solid timber doors but these have been removed. Despite being rendered internally, their original function and character is still clearly evident. The proposed works would lower the existing floor by 1.3 metres and remove the dividing walls between each vault. Windows would be installed into the elevation facing into the lightwell.'

This is largely correct, but it is not agreed that *'the character and form of each vault being a subservient ancillary space would be lost.'* The spaces will continue to occupy a subterranean location beneath the pavement – i.e. being wholly indicative of their historic form and/or function – but would be put to more beneficial use that (as a result of their obscure location and restrictive dimensions and form etc.) has previously proved prohibitive but for the purposes of extremely limited storage.

Although a modest degree of harm is undeniable with respect to what is the frankly negligible *'loss of historic fabric, as well as the overall character and hierarchy of spaces within the building'*, as noted, said hierarchy is already long-superseded.

And whilst the insertion of *'large windows in the lightwell elevation'* perhaps *'harmfully alters the appearance and character of this space'*, these would be relatively obscure features in the wider streetscape whilst enabling the credible use of this space (which, given current environmental concerns etc., is unlikely to be ever used again for the storage of coal).

The consultation next turns to perceived *'Impact on significance/Suggested amendments'*, finding that in terms of 28 John Street, *'The proposed works would cause less than substantial harm to the special interest of the listed building'*, which it is considered *'could be addressed by a more modest lowering of the floors in the, perhaps by 200-300mm to retain their special characteristics'*; although how this might circumvent the officer's in-principle concerns is unclear. In short, it doesn't.

Similarly, it is suggested that *'A small door-size opening may be possible to link a couple of the vaults, but this would need to maintain the dividing wall. The introduction of windows in the lightwell wall is not appropriate, but timber doors, perhaps with small windows might work'*.

Again, from an in-principle perspective, this would in my view alter the vaults to the same extent as existing proposals and therefore no greater benefit would be achieved, except that any credible, viable use would be compromised.

Finally, the consultation concludes that '*No heritage benefits (which are also a public benefit) are offered which would outweigh the harm*', although – with respect to other overriding/nearby assets - it is acknowledged by the officer (and agreed by myself) that '*As the works would not be visible from the wider area (only from within the application property itself) it would preserve both the setting of adjoining listed buildings and the character and appearance of the Bloomsbury Conservation Area*'.

Whilst it is accepted that negligible change and therefore a modicum of less than substantial harm would result from the implementation of proposals, the fundamental point being missed by the officer (ref: *No heritage benefits (which are also a public benefit) are offered which would outweigh the harm*) is that the scheme seeks the *optimum viable use* of the building and its component spaces in accordance with *paragraph 208* of the *NPPF*, which reads as follows:

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

This is particularly important policy and guidance with respect to designated structures and/or their component spaces which no longer serve a credible purpose or viable use, as here.

And - contrary to the views of the officer - although it is acknowledged that *some* harm would occur, this is considered only negligible and more than amply offset by the public benefit that would accrue in the form of *optimum viable use*.

Particularly where use is considered a fundamental matter of best conservation practice and the most effective and sustainable manner in which to serve the ongoing upkeep, maintenance and therefore *preservation* of a listed building, as per *s.16 & s.66* of the *Planning (Listed Building & Conservation Areas) Act 1990*.

Otherwise, the only other point to make would concern the requisite consistency of the local planning authority (LPA) in gauging applications of this sort. In light of the account given above and the associated interpretation of matters more generally, it comes as no surprise that merely cursory consideration of Camden's planning register for historic properties of this type evidences numerous (yet unlikely to be all) instances where similar schemes have recently been approved.

These would include the following:

- 18 Grove Terrace, NW5 1PH
- 64 Lincoln's Inn Fields, WC2A 3JX
- 25 Chester Terrace, NW1 4ND (the application material for which cites numerous other examples including nos. 15, 26, 33 & 38 Chester Terrace)

I trust this is of assistance, but should you have any questions or wish to discuss any aspect further, then do not hesitate to contact me.

Yours sincerely,



**Mark Sanderson BA (Hons), PG Cert., MA, IHBC
Heritage Director**

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