

HANDFORTH

HERITAGE

53 & 54 Doughty Street, Camden
Heritage Impact Assessment

March 2025

Contents

1.	Introduction	3
2.	Historic Development	4
3.	Identification of Heritage Assets and Significance Assessment	14
4.	Proposals and Assessment of Impact	34
	Appendix 1: Legislation, Planning Policy and Guidance	36

1. Introduction

This Heritage Impact Assessment ('report') has been produced by Handforth Heritage to accompany full planning and listed building consent applications relating to the proposed change of use from office to residential to Nos. 53 & 54 Doughty Street ('the site'), which is grade II listed and located within the Bloomsbury Conservation Area, and the associated physical works necessary to facilitate its reinstatement to two separate residential uses.

The report has been produced to identify and assess the significance of any Heritage Assets that may be potentially affected by the proposals and then to determine the potential impact of the scheme on this. This report has been undertaken in accordance with Historic England's guidance on heritage assessments, namely Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12 and Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (GPA 3). The legislation and policy framework applicable to this application is set out at Appendix 1.

This report should be read in conjunction with the application drawings and Design and Access statement prepared by Trehearne Architects.

All images are orientated north unless otherwise stated.



Figure 1 Site location plan, showing site in red.

2. Historic Development

The site is located within the Bloomsbury Conservation Area which covers approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east. The area is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area. Its expansion northwards from *circa* 1660 to 1840 led to a consistency in the street pattern, spatial character and building forms despite its size and varying ownerships.

The earliest map consulted dates to 1746, here the site has yet to be developed, and the area still has a rural appearance albeit development can be seen to the south and east. The site formed part of the Doughty Estate which was linked with the Foundling Estate and settled by Sir Edward Doughty, who owned land in Buckinghamshire, Suffolk, Lincolnshire and Dorset. Its boundaries followed the old parish boundary on the south, Gray's Inn Road on the east and adjoined the Foundling Estate, west and north. In 1792 Henry Doughty 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 1799–1800 building leases were granted for the completion of the south part of the west side of the street. The south part of the east side of the street was completed between 1807–09 and the northern end, which lies in the Foundling Estate, was completed by 1810. The extent of the development can be seen on the 1828 Greenwood map.

The Census provides a useful indication for how the properties were used historically. The 1841 records Nos. 53 and 54 as two separate dwelling. No. 54 is occupied by the Woolcutts (two persons) with three servants and three lodgers. No. 53 is occupied by the Cubitts (six people) and four servants. The 1871 OS map provides an early detailed view of the area. Here it is clear that all the terraces have been built in a relatively regular pattern with closet wings to rear. The map shows a small lightwell to the rear of the building, a feature that is prevalent on most buildings within the street. The site is clearly made up of two structures with single closet wings and lightwells to their northern aspects.



Figure 2 1746 Rocque map showing the site prior to its development. Note urban sprawl to the south.

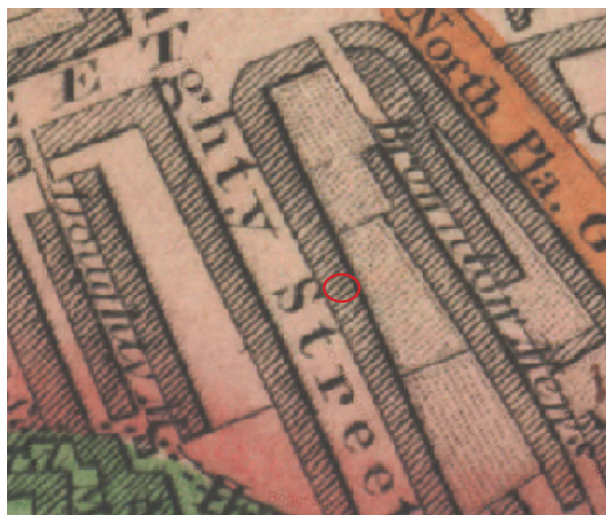


Figure 3 1828 Greenwood map showing early cartographic evidence for the site and surroundings.

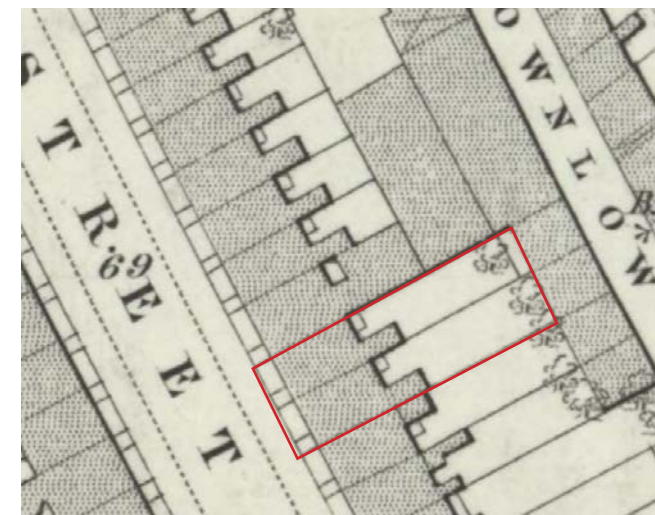


Figure 4 1871 OS map showing the site and surroundings in greater detail.

2. Historic Development

The 1894 and 1951 OS maps show no changes to the footprint of the site. In the wider area the original form of the majority of buildings is still largely legible with only small changes visible to properties, largely to the rear. The 1951 map shows the mews buildings to the rear individually numbered suggesting they may have been physically separated from the principal dwellings at this point. Aerial photographs from 1931 also provide an indication of the historic form of the structures, here showing no rear extension but three tiered closet wing configurations.



Figure 5 1894 OS map showing no change to the footprint of the site.



Figure 6 1931 aerial view prior to the extension to the rear.



Figure 8 1951 OS map showing no change to the footprint of the site.

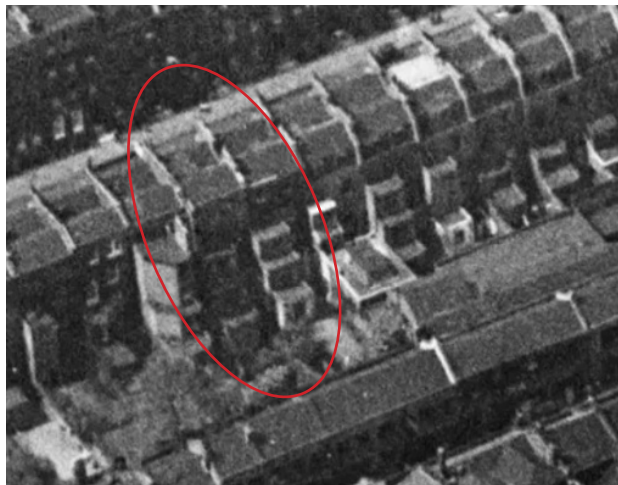


Figure 7 1931 aerial view.

2. Historic Development

Camden Archives have a number of documents that provide further detail into the historical evolution of the site. 1921 sales particulars of the Doughty Estate outlined below provide an interesting insight into the interiors at the time:

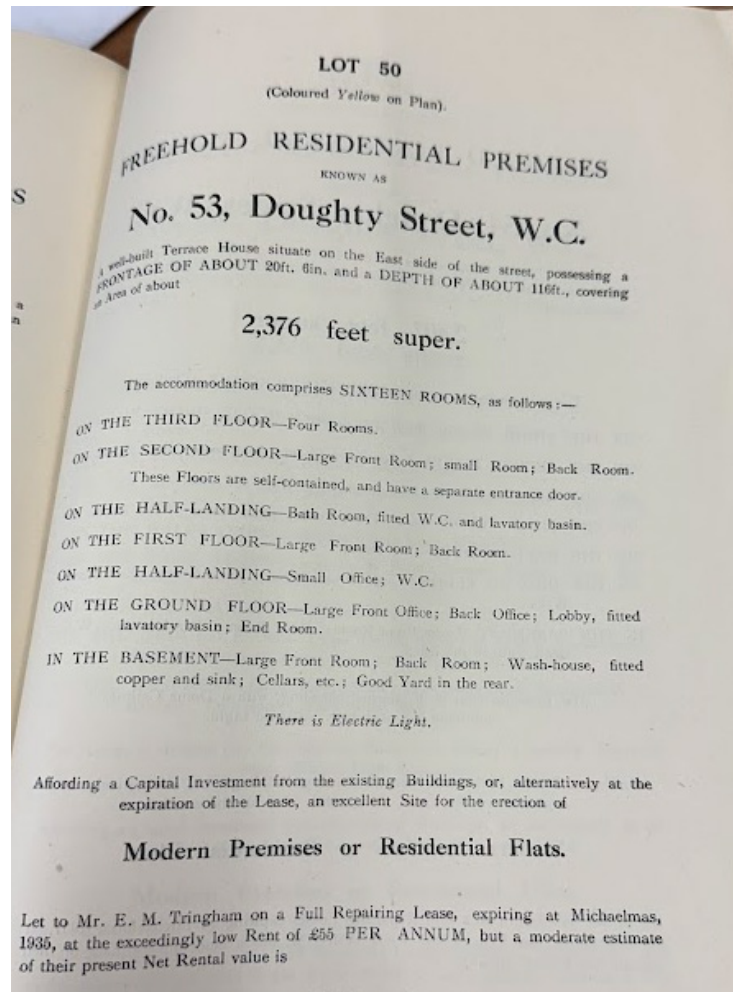


Figure 9 1921 sales particulars of No. 53.

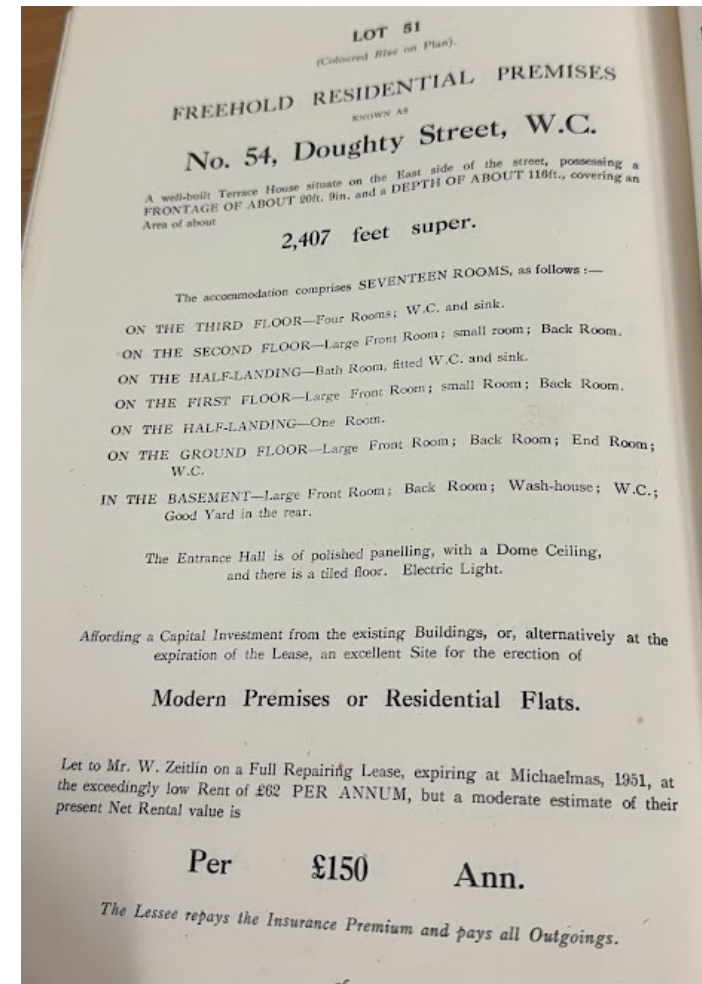


Figure 10 1921 sales particulars of No. 54.

2. Historic Development

Both the archives and the council's website have drawings of the buildings that further help inform an understanding of their evolution. 1954 and 1956 plans show that No. 53 was bought by the Lithographic Artists Society in 1953 and No. 54 several years before. No. 53 was purchased to house additional staff and overflow of staff working in No. 54. It was during this period that the two properties were connected to one another. Outlined below are a series of plans which are considered to be of relevance:



Figure 11 1956 existing plan of basement.



Figure 12 1956 Proposed plan of basement showing removal of original features.

2. Historic Development

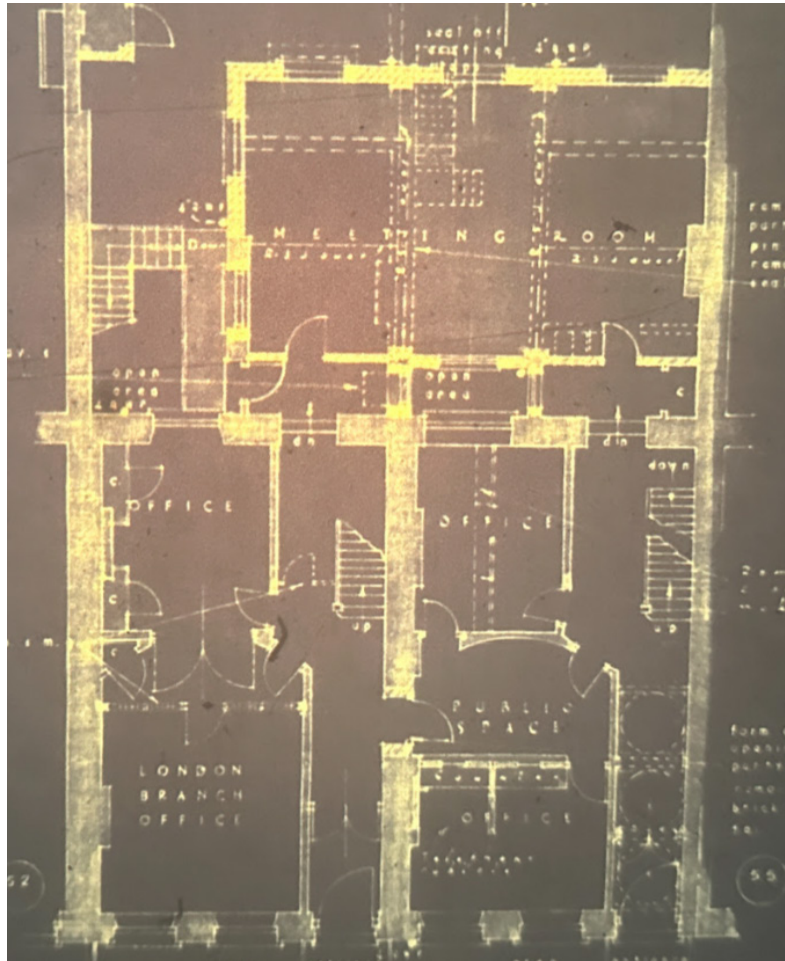


Figure 13 1956 ground floor plan showing proposed works.

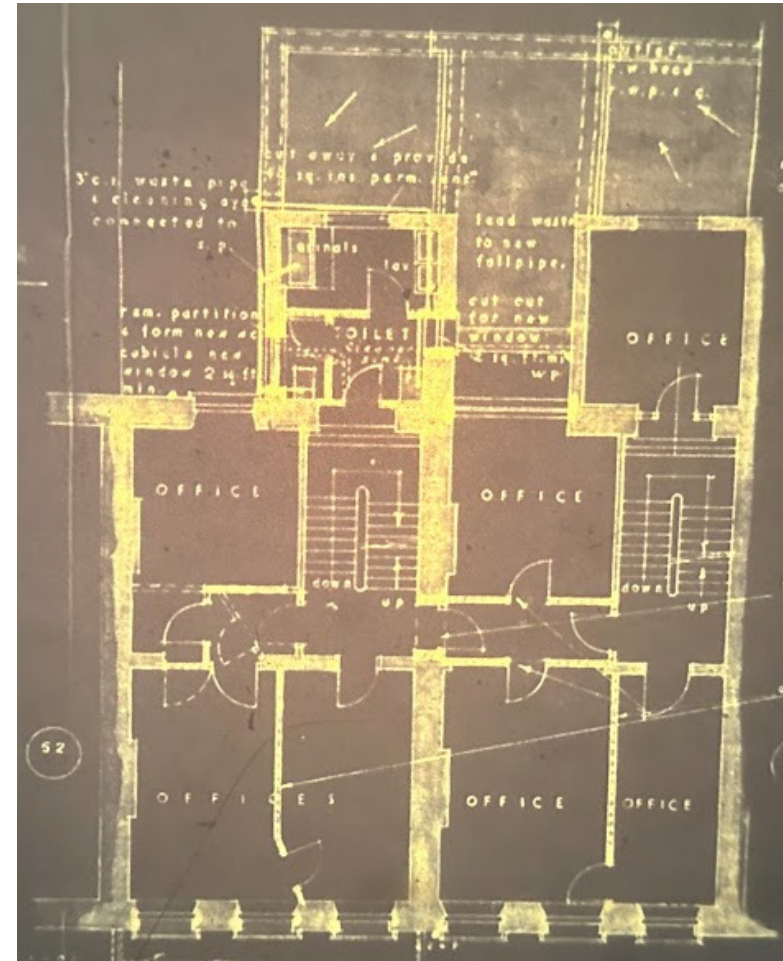


Figure 14 1956 first floor plan showing proposals.

2. Historic Development

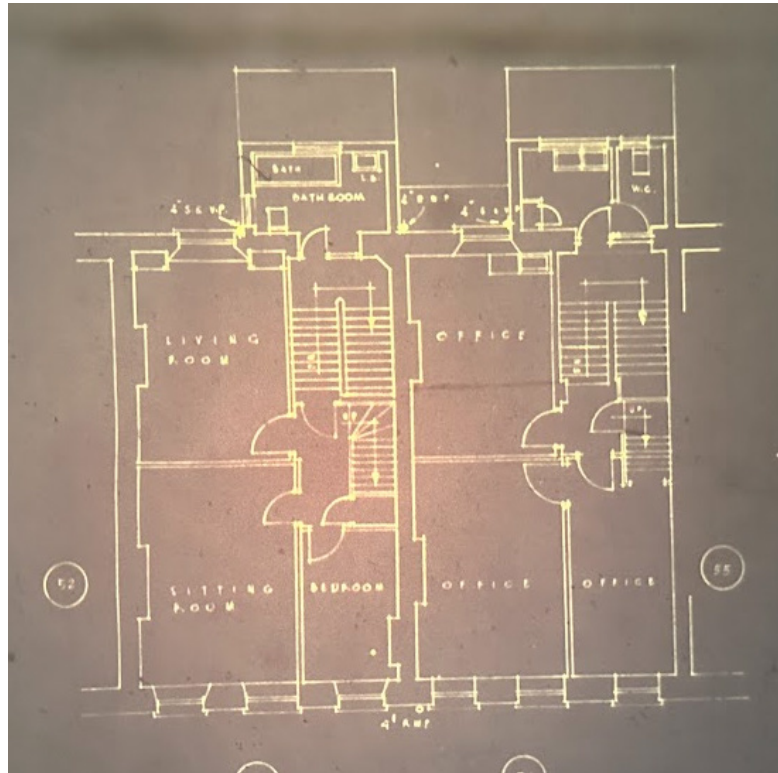


Figure 15 1954 plan of second floor prior to works.

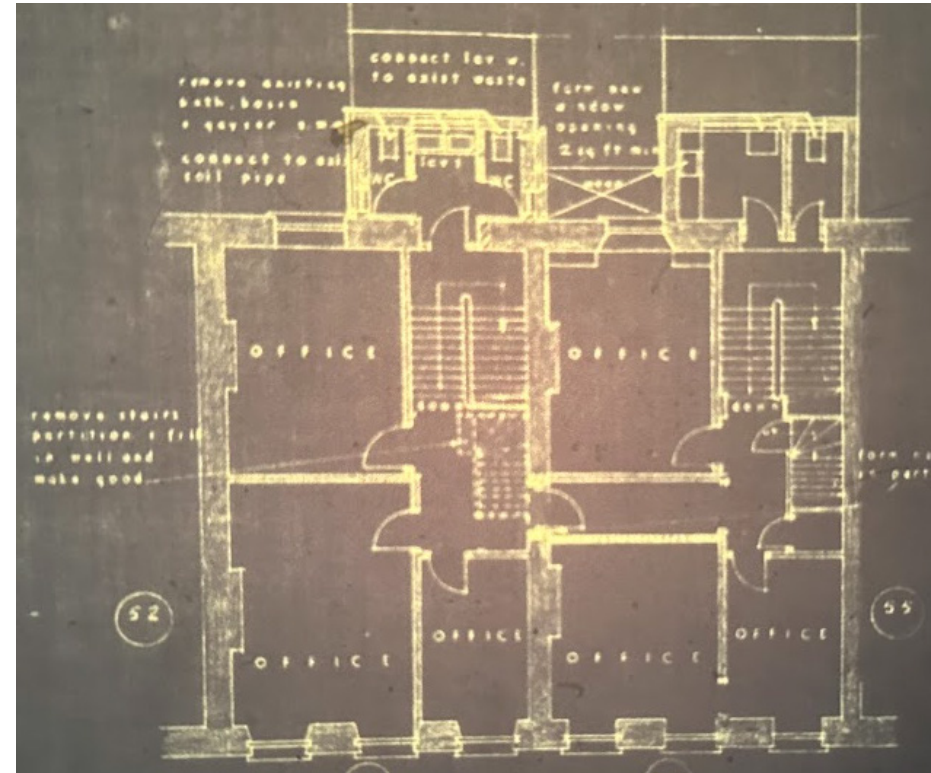


Figure 16 1954 plan proposed works showing first floor (bottom) and second floor (top).

2. Historic Development

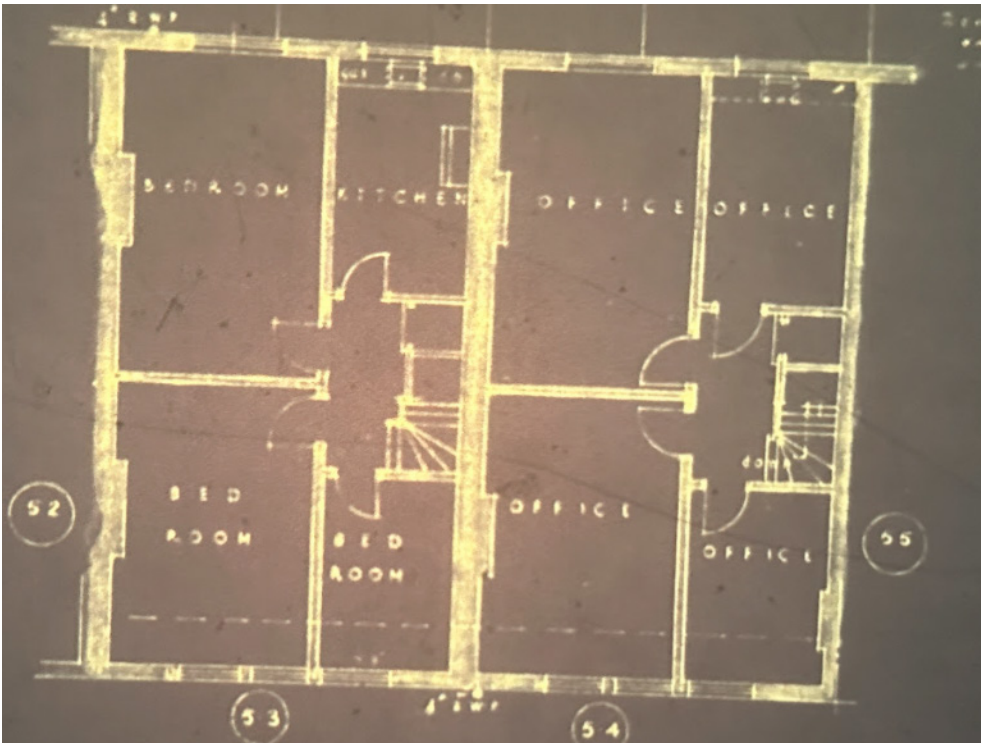


Figure 17 1956 existing third floor plan.

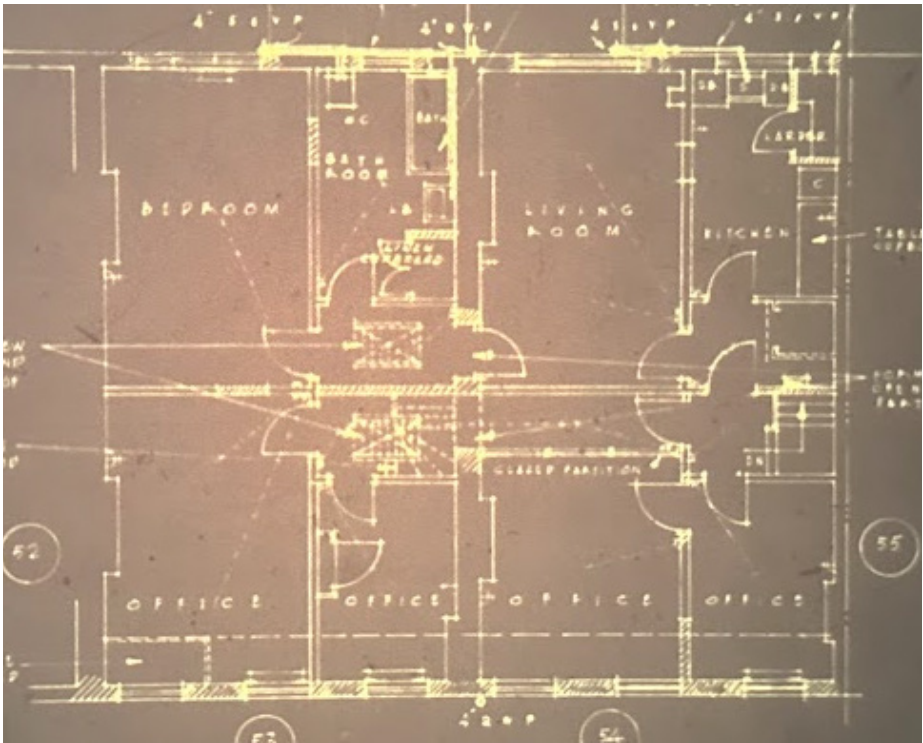


Figure 18 1956 proposed plan of third floor.

2. Historic Development

The drawings below show the extension to the rear of the site, and its reconfiguration and enlargement as part of a 1987 permission:

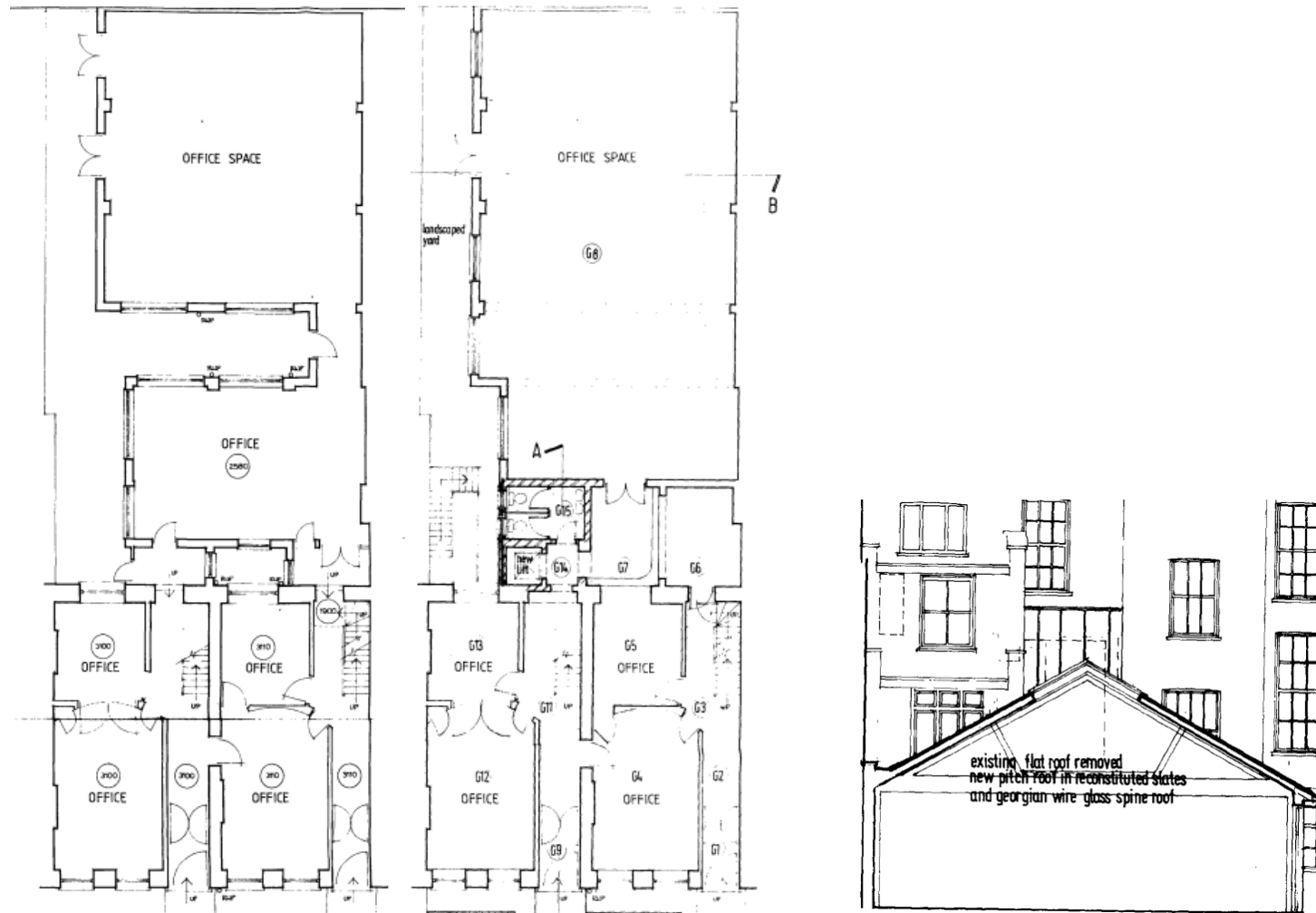


Figure 19 1987 permission (ref: 8770502) showing the infilling of the modern rear extension (existing, left, consented, middle). Right Image shows that the pitched roof structure was added at this time.

2. Historic Development

Other consented planning applications considered to be of relevance are highlighted below for reference:

2017/3683/L 53-54 Doughty Street London WC1N 2LS Internal alterations including the installation of partition walls at basement level and within the modern extension to the rear at ground floor level; removal of false chimney breast and suspended ceilings at ground floor level; various other general repair and refurbishment works. FINAL DECISION 28-06-2017

2007/6105/L 53 & 54 Doughty Street London WC1N 2LS Details of internal pipe runs for the air conditioning units pursuant to condition 4 of listed building consent dated 31st August 19-12-2007

2007 (ref. 2007/0775/L) (for external alterations in association with the refurbishment of the existing office building (Class B1). FINAL DECISION 19-12-2007

2007/4533/L 53 & 54 Doughty Street London WC1N 2LS Details of security cameras pursuant to condition 3 attached to listed building consent granted on 31/08/2007 (ref:2007/0775/L), for external alterations in association with the refurbishment of the existing office building (Class B1). FINAL DECISION 21-09-2007

2007/0775/L 53 & 54 Doughty Street London WC1N 2LS External alterations in association with the refurbishment of the existing office building (Class B1) incorporating the installation of 2 air conditioning units in rear lightwell; replacement of existing plastic roof of the rear link structure and the insertion of new door and window at rear ground floor level; installation of timber panels to the entrance doors to replace unauthorised glass panels; installation of 2 security cameras on front elevation; and internal alterations. FINAL DECISION 19-07-2007

2007/0774/P 53 & 54 Doughty Street London WC1N 2LS External alterations in association with the refurbishment of the existing office building (Class B1) incorporating the installation of 2 air conditioning units in rear lightwell; replacement of existing plastic roof of the rear link structure and the insertion of new door and window at rear ground floor level; installation of timber panels to the entrance doors to replace unauthorised glass panels; and installation of 2 security cameras on front elevation. FINAL DECISION 19-07-2007

8970081 53-54 Doughty Street WC1 Subdivision of rooms on second third floors and at basement level *as shown on drawing numbered 101417/1 and letter dated 25th May 1989. FINAL DECISION 16-05-1989

870361453-54 Doughty Street WC1 Erection of extensions at the rear of ground second and third floors and construction of a new roof over the existing ground floor rear extension for use as offices as shown on drawing numbers 3260/1 1864/P1A & 1864/P2 revised by letter dated 10th November 1987. FINAL DECISION 30-10-1987

877050253-54 Doughty Street WC1 Alterations to rear additions and minor internal alterations as shown on drawing numbers 3260/1 1864/P1A & 1864/P2 revised by letter dated 10th November 1987. FINAL DECISION 20-10-1987

CTP954953 & 54 Doughty Street, Camden. The erection of a small ground floor office extension at the rear of 53 & 54 Doughty Street, Camden. FINAL DECISION 21-08-1970

CTP6591Nos 53-54 Doughty Street, Camden. The erection of an additional storey of office accommodation at first floor level, at the rear of Nos 53-54 Doughty Street, Camden. FINAL DECISION 31-01-1969

69277/12379 Nos. 53 and 54 Doughty Street, St. Pancras. The erection of a single-storey extension at ground floor level at the rear of Nos. 53 and 54 Doughty Street, St. Pancras, for use as a meeting and committee room, and interview rooms in connection with the existing use of the premises as the Headquarters of the Society of Lithographic Artists. FINAL DECISION 28-08-1961

2. Historic Development

69277/28977 Nos. 53 and 54 Doughty Street, St. Pancras. The erection of a single-storey extension at ground floor level at the rear of Nos. 53 and 54 Doughty Street, St. Pancras, for use as a meeting and committee room and interview rooms in connection with the existing use of the premises as the Headquarters of the Society of Lithographic Artists. 14-03-1961

69277/11970 Nos. 53-54 Doughty Street, St. Pancras. Alterations and extensions at third floor level at Nos. 53-54 Doughty Street, St. Pancras and for the use of the two front rooms on the third floor of No. 53 for office purposes and the two rear rooms on the third floor of No. 54 for residential purposes. 20-08-1960

69277/314 Nos. 53 and 54 Doughty Street, St. Pancras. The erection of a single-storey extension at ground-floor level at the rear of Nos. 53 and 54 Doughty Street, St. Pancras, for use as a meeting and committee room in connection with the existing use of the premises as the headquarters of the Society of Lithographic Artists. FINAL DECISION 02-04-1959.

Key points to take from these applications are that the large extension to the rear of building was granted listed building consent and planning permission in 1959. It appears to have been constructed sometime in the 1960s and was used as meeting rooms for the Lithographic Society. The structure was constructed with a flat roof which was adapted with a pitched in 1987.

3. Identification of Heritage Assets and Significance Assessment

An inspection of the relevant databases and sources, including the Historic Environment Record (HER), the National Heritage List for England (NHLE), and the Council's website, has identified numerous Heritage Assets lying within the vicinity of the Site. Following desk based research and on site analysis, professional judgement has been used to identify and select Heritage Assets whose significances may be affected by changes to their settings or direct impacts. This assessment has been undertaken in accordance with Historic England's *Statement of Heritage Significance: Analysing Significance in Heritage Assets* and Historic England's *Advice Note 12 The Setting of Heritage Assets GPA 3*. In accordance with Paragraph 207 of the NPPF the level of detail is proportionate to the Assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

The Heritage Assets that have the potential to be affected by the proposals is outlined below:

1. Numbers 39-47 and 49-62 and Attached Railings, Doughty Street, Grade II
2. Bloomsbury Conservation Area

Other Heritage Assets were identified as part of this process but were excluded from assessment due to either a lack of visible or experiential connection with the Site.

The following section provides a description of the assets above, followed by an assessment of their significance.



Figure 20 Showing the site (1) which sits within the wider listed terrace. The whole image is located within the Bloomsbury Conservation Area (2).

3. Identification of Heritage Assets and Significance Assessment

1. Numbers 39-47 and 49-62 and Attached Railings, Doughty Street, Grade II

The site was grade II listed in 1974 and the list entry updated in 1999 which reads as follows:

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

GV II

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

No. 53 Exterior

The facade of the site retains its historic six panelled entrance door and surrounds with traditional fanlight above. The fenestration across the facade has been replaced with later



Plate 1 No. 53 (left) and No. 54 (right).



Plate 2 Showing small area of outdoor space to the rear of No. 53 note modern closet wing and single storey extension.

3. Identification of Heritage Assets and Significance Assessment

one over one sashes. The building was extended upwards, likely in the Victorian period as delineated by the strong cornice line between it and the second floor. Later black and white clay tiles clad the front entrance steps which would have likely originally been stone. Much of the rear has been considerably altered through the addition of a large single storey rear extension and full height closet wing extension. Later six over six sash windows are located on the main body of the building at ground, first and second floors. The top storey window features a tripartite configuration.

No. 54 Exterior

The facade of No. 54 is similar to No. 53 with later upwards extension and later one over one sash windows and traditional six panelled timber front door and historic fanlight above. The front steps have been clad using colourful mosaic, likely a Victorian addition that would have replaced stone.

The rear of the building is dominated by the single storey extension which takes up the entire original rear plot and a considerable part of No 53's. Views of the rear of the main building were partially visible from the roof of the extension. Here the modern glazed roof separating the single storey extension and main building are visible along with the stepped closet wing with later casement window at ground floor.



Plate 3 View of modern glazed extension to the rear of No. 54.



Plate 4 View of rear elevation of No. 54 and full height modern closet wing to No. 53.

3. Identification of Heritage Assets and Significance Assessment

No. 53 Basement

Starting with the basement level of the building, historic plans have shown that this level has been considerably altered overtime which has resulted in a considerable loss of the floor's original appearance. Changes here include the lateral connection with No. 54, the loss of the staircase and 'dual' closet wing configuration. The floor retains no fixtures or fittings of interest although chimney breasts are still appreciable. The historic front and rear room floor plan is partially appreciable, although the rear room is now a similar size due to the loss of the staircase.

No. 54 Basement

The historic plan form here is more legible in No. 53 due to the presence of a staircase and rear room's historic proportions. Notwithstanding this there is very little of historic interest surviving, and the staircase, whilst in its original position, appears to be a later addition. The historic closet wing is noticeable by its vaulted ceilings.

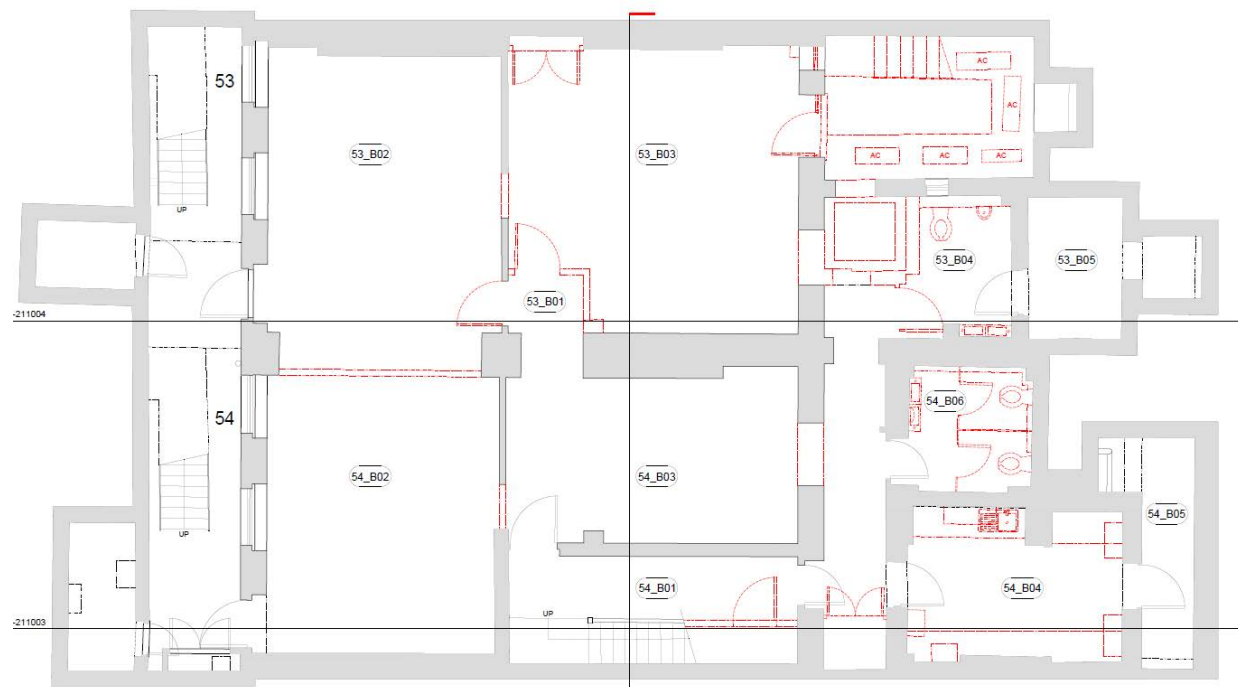


Figure 21 Basement plan showing proposed demolition in red (No. 53 top and 54 bottom).

3. Identification of Heritage Assets and Significance Assessment



Plate 5 View showing rear basement room to No. 53 with no historic fixtures or fittings visible.



Plate 6 Rear room to No. 53 with modern duct and suspended ceiling visible.



Plate 7 View showing front basement room of No. 53.

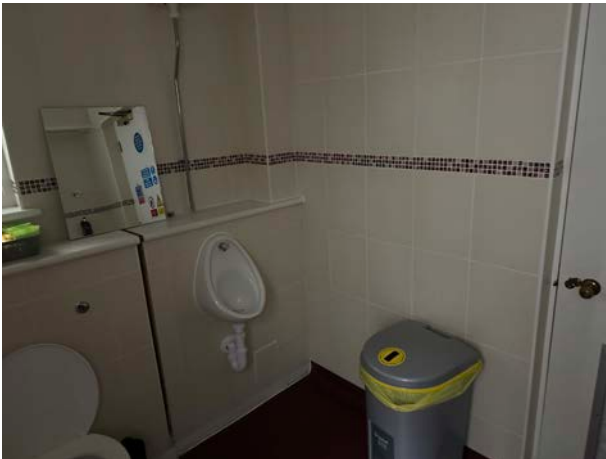


Plate 8 Modern toilets to rear closet wing of No. 53.

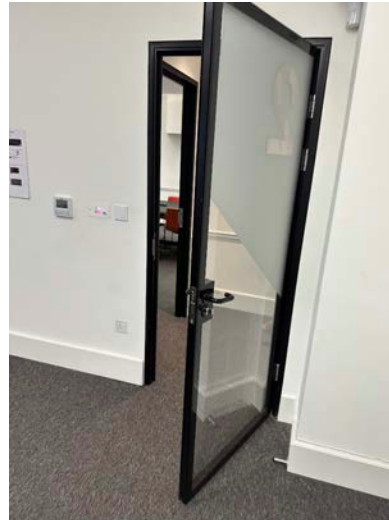


Plate 9 Modern glazed door to No. 53.



Plate 10 Modern Georgian wired glass to later window.

3. Identification of Heritage Assets and Significance Assessment



Plate 11 View showing front basement room to No. 54.



Plate 12 View of staircase corridor.



Plate 13 View of vaulting to closet wing.



Plate 14 View of rear room to No. 54 with no features of interest



Plate 15 View of vaulting to closet wing.



Plate 16 Modern staircase in historic location.

3. Identification of Heritage Assets and Significance Assessment

No. 53 Ground Floor

Moving to the ground floor level, this space contains some of the most significant elements of historic and architectural interest. The entrance hall is carpeted so it is unclear whether any historic fabric survives beneath. The ceiling features an historic cornice which has been adapted to accommodate the later secondary glazed doorway to the hall. The staircase is an original geometric composition with mahogany handrail with stick balusters. To the rear, the hallway has been enlarged through the removal of the original stair that would have led to basement level.

The front room still features its curved spine wall with symmetrically placed six panelled doors and larger central doors (of some historic note but likely a later insertion). The chimney breast is still visible albeit with no surviving fireplace. Other features of interest include the cornice and shutters to windows. A suspended raft ceiling partially obscures the full proportions of the room. The rear room features a similar number of historic features to that of the front, although no cornice was visible. The rooms retains its chimney breast although an additional 'chimney breast' on the opposite wall confuses the original floor plan of the building and is believed to house services. The rear closet wing features modern toilets and lift enclosure.

No. 54 Ground Floor

The entrance hallway is one of the most impressive spaces in the whole building with raised domed ceilings into the depth of the floor joists above. Paterae with reclining figures are visible in the arched elements and further relief in the pendentives. The plaster is heavily ornamented with beading, fluting, guilloche, water leaf and egg and dart details visible. The floor features a decorative encaustic tile floor, likely Victorian, and geometric stair with brass inlaid mahogany handrail.

The front room retains much of its historic appearance (although the lateral connection has eroded this to some degree), with curved spine wall with symmetrically placed six panelled doors. The

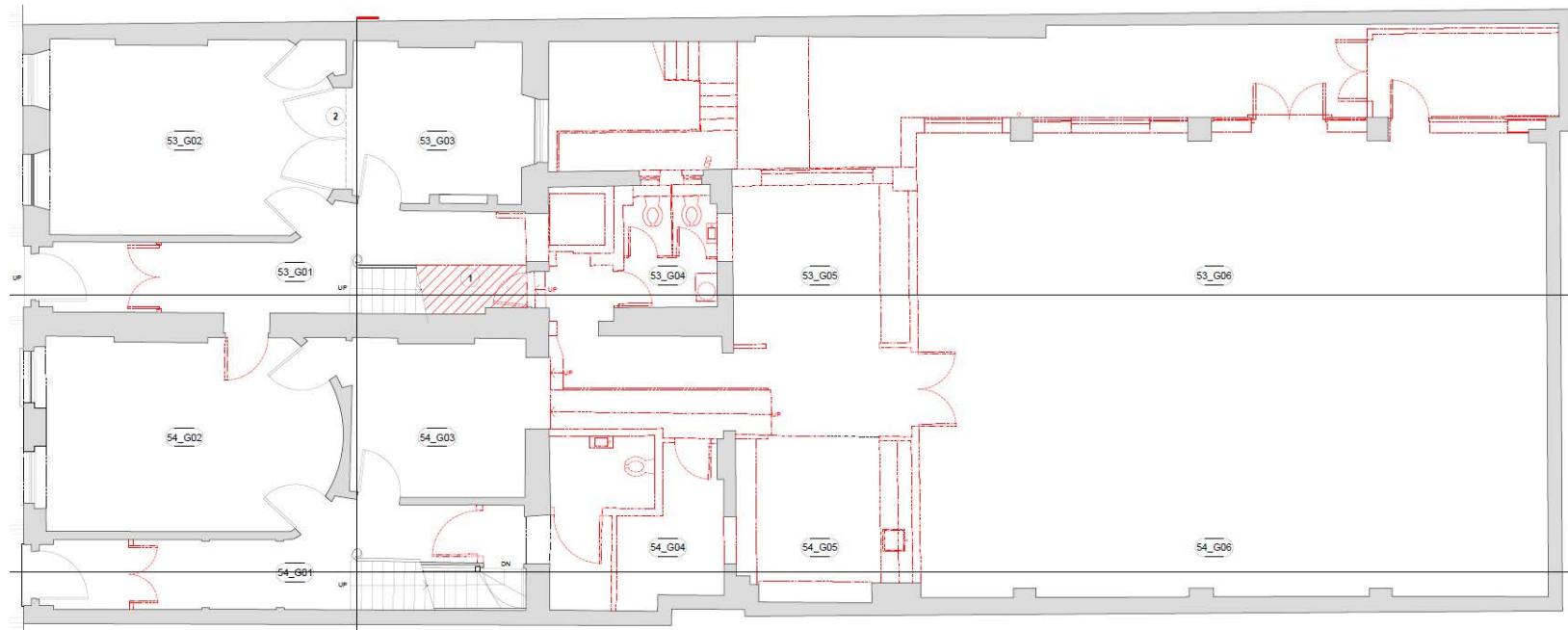


Figure 22 Ground floor plan showing proposed demolition in red.

3. Identification of Heritage Assets and Significance Assessment



Plate 17 Historic cornice to No. 53 hallway, with modern door to centre.



Plate 18 View of front room to No. 53.



Plate 19 Historic curved panelled door to front room.



Plate 20 Historic shutters and later 6 over 6 sash to rear room.



Plate 21 Blocked doorway to spine wall to rear room.



Plate 22 Later 20th century extension to rear that spans both No. 53 and 54.

3. Identification of Heritage Assets and Significance Assessment

rear room has been remodelled significantly with the extension to the rear resulting in an open plan form arrangement and the loss of much of the rear wall.



Plate 23 Decorative ceiling and fanlight to No. 54 entrance hall.



Plate 24 Decorative moulded domed ceiling to entrance hall.



Plate 25 Rear room which has been heavily altered with being connected to rear extension.



Plate 26 Showing front room with much fabric intact but lateral connection with No. 53.



Plate 27 Victorian tile to hall and brass inlaid mahogany handrail.



Plate 28 View of modern connection to rear.

3. Identification of Heritage Assets and Significance Assessment

No. 53 First Floor

The first floor level or *piano nobile* was traditionally the most impressive space in Georgian terraces. The front room still remains the largest space within the historic part of the property. The room retains several features of interest including panelled door, architraves, cornice and double door concealed behind bookcase. A partially dropped ceiling has eroded the original proportions of the space. The rear room similarly features a number of features of interest including cornice shutters and window surrounds. As with the front room, the space has lost its historic fireplace but the chimney breast remains appreciable behind modern shelving.

No. 54 First Floor

The first floor room here is similar to No. 53 in appearance but has fewer original surviving details. Elements of interest that survive are limited to doors and surrounds. The cornice features a similar configuration to that of No. 53's but is much crisper, suggesting it has been replaced at some point. The room also features a suspended raft ceiling which has eroded the space's original proportions.

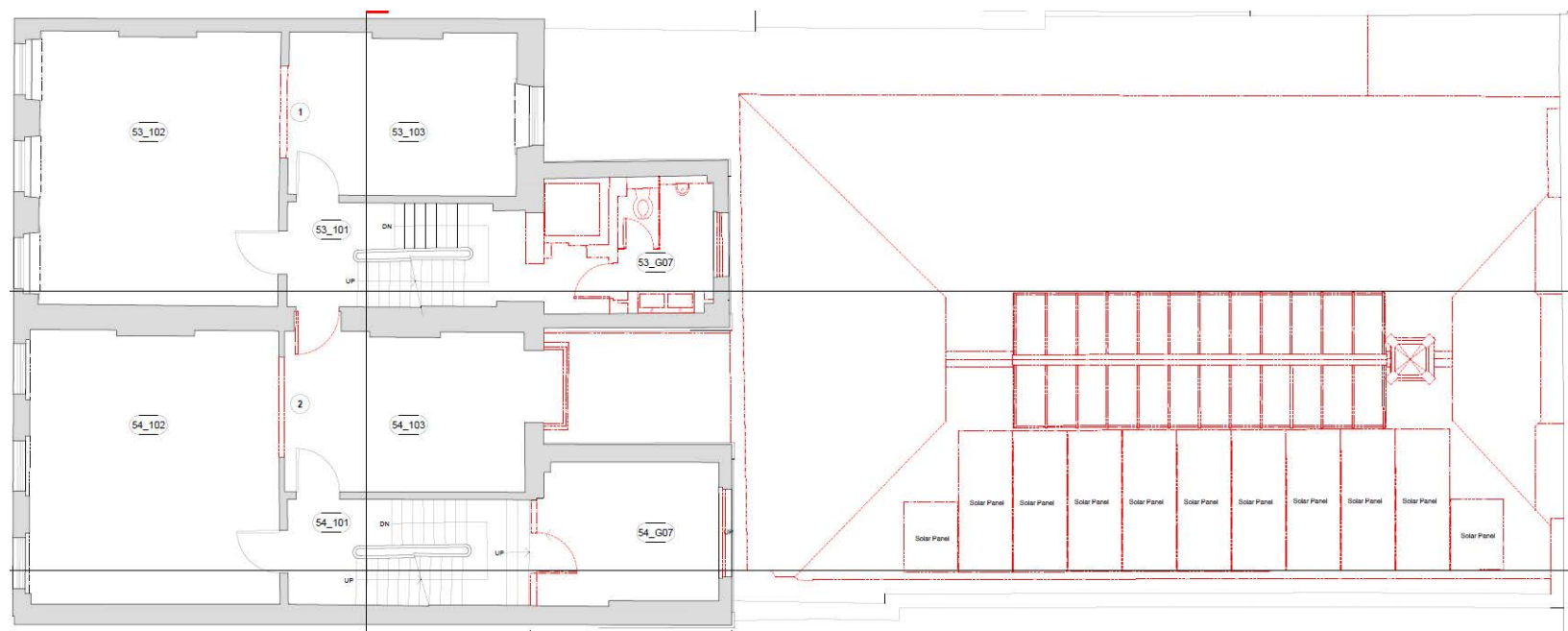


Figure 23 First floor plan showing proposed demolition in red.

3. Identification of Heritage Assets and Significance Assessment



Plate 29 First floor front room of No. 53 showing suspended ceiling and obscured double door in spine wall.



Plate 30 Detailed view of historic water leaf and rinceau cornice to front room partially obscured by suspended ceiling.



Plate 31 View of chimney breast and historic cornice to rear room.



Plate 32 View of rear room showing historic cornice and shutters.

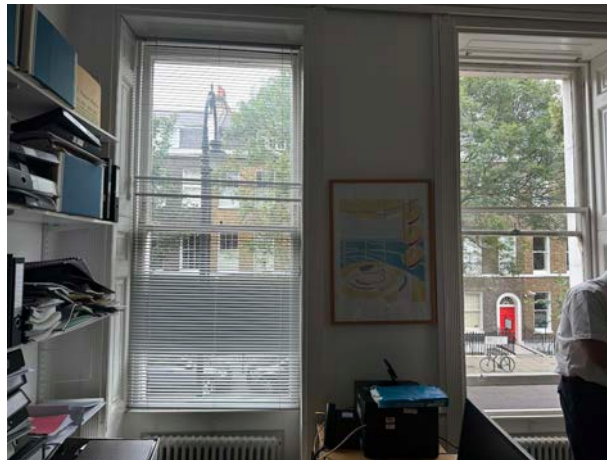


Plate 33 view of modern door opening to closet wing off staircase landing.

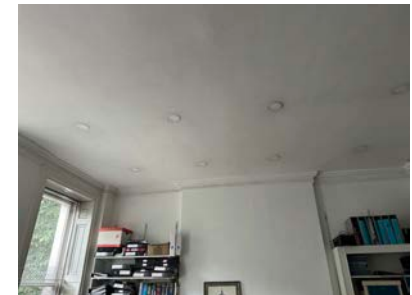


Plate 34 View of lift to left and modern door to toilet within closet wing.

3. Identification of Heritage Assets and Significance Assessment



Plate 35 Showing modern suspended ceiling to front room of No. 54.

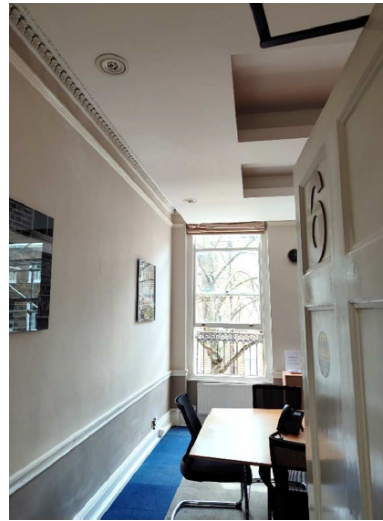


Plate 36 Suspended ceiling to front room.



Plate 37 Modern replica cornice based on historic detail (ref: plate 30)



Plate 38 Rear room showing adapted rear window with view into modern glazed extension.

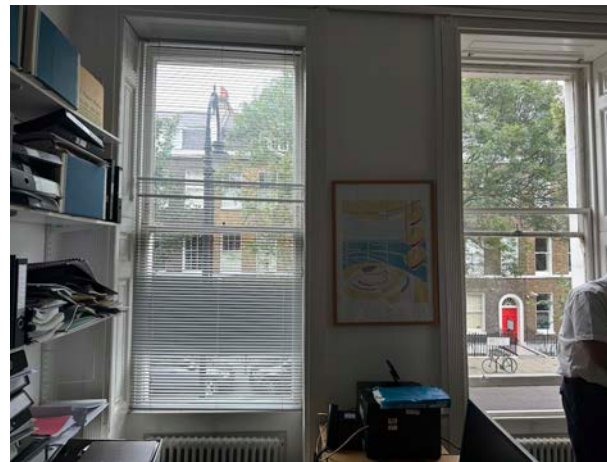


Plate 39 Showing historic cornice and adapted ceiling.



Plate 40 View of historic geometric staircase.

3. Identification of Heritage Assets and Significance Assessment

No. 53 Second Floor

The typical Georgian feature of a dual arch partition between the primary and secondary staircase is visible here and of architectural and historic interest. The original secondary stair has been removed however and new stair erected directly above (post 1950s), having a negative impact on the historic plan form of the building.

The historic floor plan of this level appears to be intact with three chimney breasts visible in each room although the smallest front room wall has an uncharacteristic kink in it. Some historic joinery survives at this level including a timber apron beneath the front window but much fabric has been removed.

No. 54 Second Floor

As with No. 53, the plan form here is very similar although the small front room has been further compromised by the insertion of a lobby within the space. Whilst the secondary stair has been removed eroding the original floor plan, the principal staircase has not been directly extended upward (like No. 53), allowing the dual arch configuration to landing to be better appreciated. Most fixtures and fittings surviving at this level are later 20th century additions.

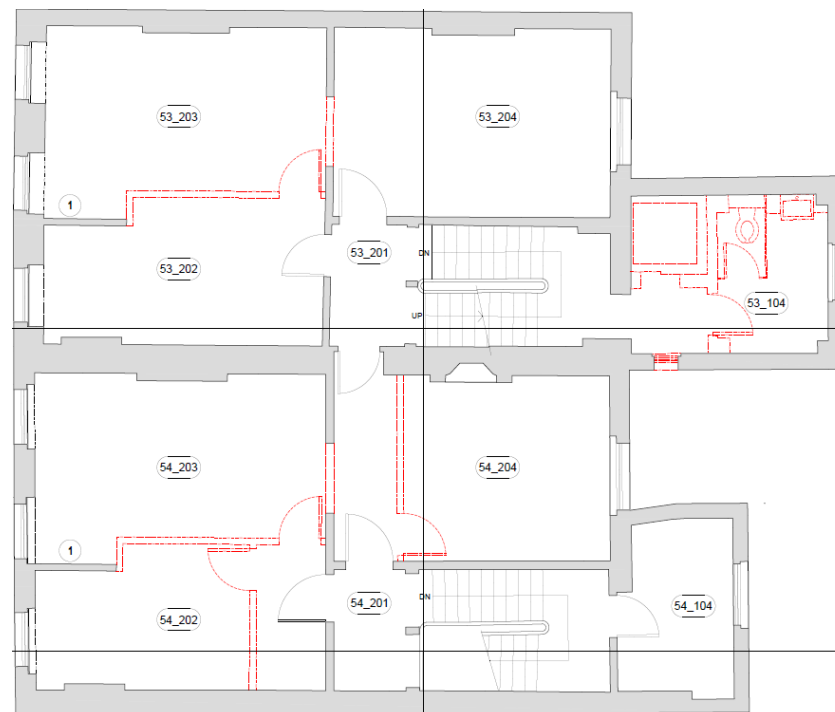


Figure 24 Second floor plan showing proposed demolition in red.

3. Identification of Heritage Assets and Significance Assessment



Plate 41 Dual archway to No. 53 which would have originally separated the secondary stair from the principal stair.



Plate 42 Small front room showing limited features of interest.



Plate 43 Front room looking back to modern lobby.



Plate 44 Larger front room showing limited features of interest.



Plate 45 Rear room showing limited features of interest.



Plate 46 Staircase landing showing lateral connection with No. 54.

3. Identification of Heritage Assets and Significance Assessment



Plate 47 Dual arch configuration.



Plate 48 View of staircase ceiling showing modern cornicing.



Plate 49 Modern corridor which connects to No. 53.

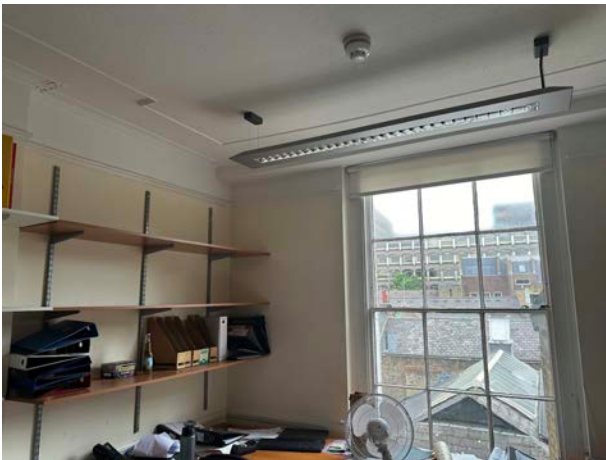


Plate 50 Rear room showing limited surviving features of interest.



Plate 51 Larger front room showing limited surviving features of interest.



Plate 52 Small front room showing limited surviving features of interest.

3. Identification of Heritage Assets and Significance Assessment

No. 53 Third Floor

The third floor is accessed via the later 20th century staircase above the original, which has considerably altered the plan form at this level. The raised closet wing has also changed the historic appearance of the landing here. The layout of the space appears to be broadly as it would have been historically (with the exception of the loss of the secondary stair. Most fixtures and fittings within the space are modern and no historic fireplaces survive. The space would have originally been in the attic of the building, with the sheer brick walls being added sometime in the Victorian period.

No. 54 Third Floor

The historic floor plan of this level of the building has suffered considerably through the loss of its secondary staircase, replaced with another room. A central corridor provides access to all the rooms and No. 53 which further erodes the historic layout of the space. The floor features no surviving features of interest and would have originally been in the attic of the building, with the sheer brick walls being added sometime in the Victorian period.

Significance

The buildings are of architectural interest in terms of its wider contribution to the listed terrace and also in their surviving interior historic features. This architectural interest has been eroded to some degree through the loss of features and through the later additions to the rear, but many features are still legible. This is especially in the case of No. 54's entrance hallway ceiling which survives remarkably intact. The buildings also have historic and evidential value as part of the wider Doughty Estate development as an important part of the wider development of Bloomsbury. Its setting also largely positively contributes thanks to the retention of much of its original character.

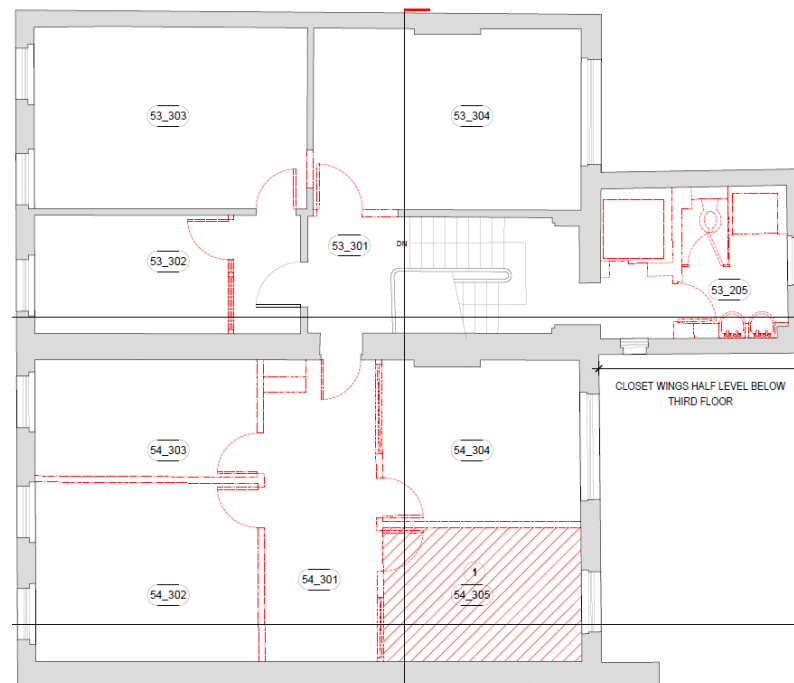


Figure 25 Third floor plan.

3. Identification of Heritage Assets and Significance Assessment



Plate 53 Later staircase added to third floor of No. 53 when the secondary stair was removed.



Plate 54 View from third floor down to landing showing modern extension.



Plate 55 Modern lobby visible from landing.



Plate 56 View of larger front room with no features of interest.



Plate 57 View of smaller front room with no features of interest.

3. Identification of Heritage Assets and Significance Assessment



Plate 58 View of modern corridor to No. 54 of no interest.



Plate 59 View of larger rear room showing no features of interest.

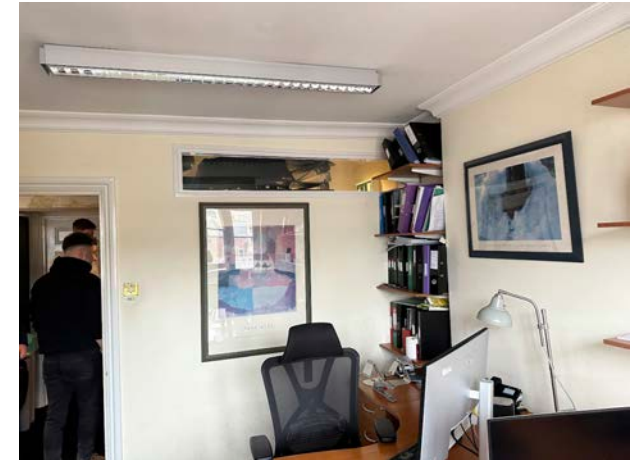


Plate 60 View of larger rear room showing no features of interest.



Plate 61 View of smaller rear room (where the staircase was historically), showing no features of interest.



Plate 62 Showing larger front room with no features of interest.



Plate 62 Showing smaller front room with no features of interest.

3. Identification of Heritage Assets and Significance Assessment

2. Bloomsbury Conservation Area

The Bloomsbury Conservation Area was first designated in 1968, largely to protect the Georgian character of the area. It was later extended to protect later Victorian, Edwardian and 20th century development. The most recent Conservation Area Appraisal produced by the council was adopted in 2011.

The Conservation Area is located in the south-east of the London Borough of Camden and stretches from Euston Road in the north to Lincoln's Inn Fields in the south. It covers an area of approximately 160 hectares. Its historic character is defined by the grid-like layout of residential streets which are punctuated by larger institutional buildings (such as the British Museum and University of London) and green, open squares. The built form is predominantly classical, although there is a large mixture of architectural styles found within the later extended areas. This variety is reflected in the fact that the conservation area appraisal identifies 14 character areas in total. The site is located within the 'Sub Area 10: Great James Street/Bedford Row'.

Bloomsbury saw rapid growth in the mid 17th century up until the early 19th century with the advent of the Napoleonic Wars. Its residential popularity receded in the 19th century with educational, medical, commercial and cultural uses dominating.

The significance of the conservation area is as a large area comprising a series of planned elements of formal townscape as the city of London expanded northwards during the 17th and 18th centuries, and later redevelopments of the 19th to 21st centuries.

The conservation area is of historical interest in illustrating the rapid expansion, population growth and prosperity of this part of London from the 17th century, and how its use and character has continuously evolved. The area also is of architectural interest in illustrating past approaches to architectural design, planning, style and use of materials across this period, which has resulted in a rich and diverse townscape of buildings and space with a distinctive sense of place.

The site is located within Sub Area 10, Great James Street/Bedford Row which is described within the council's conservation area appraisal as being:

...developed during the Georgian and Regency periods under various ownerships, although part of the street pattern was laid out earlier by Nicholas Barbon. The area has a clear street hierarchy structured on a grid layout. Bedford Row, Doughty

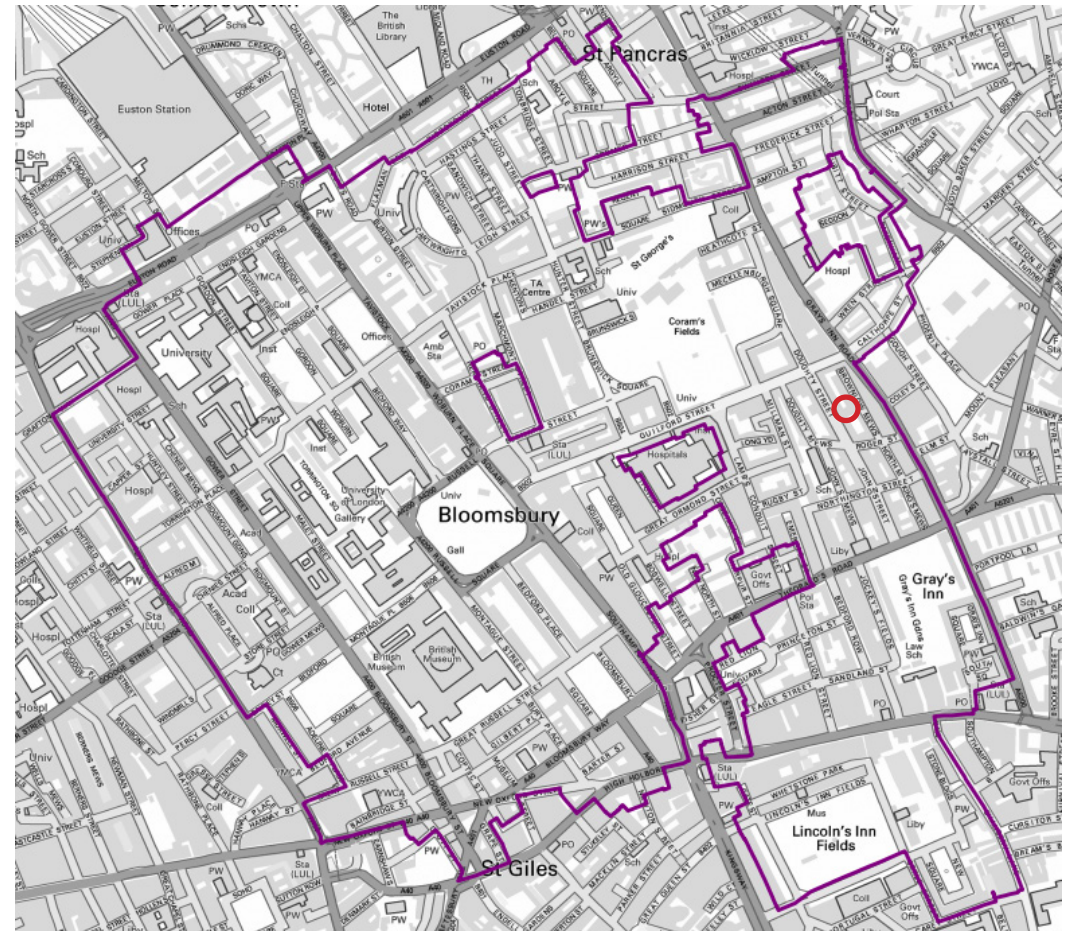


Figure 26 Bloomsbury Conservation Area Map (indicative site location in red circle).

3. Identification of Heritage Assets and Significance Assessment

Street and John Street are wide thoroughfares characterised by larger properties... Although the overall perception is one of homogeneity; there is subtle variation in the detailing of the terraces, often derived from the piecemeal nature of the building process. The strong uniformity in appearance is due to the consistency of materials. Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares (John Street, Doughty Street, Bedford Row, Rugby Street and Great James Street) are dominated by office uses but retain some residential uses (in particular in Millman Street)

The site itself provides a positive contribution to the conservation area as one of the early developments in the area and as part of the wider listed terrace.



Figure 27 Bloomsbury Conservation Area Map showing sub area 10, Great James Street/Bedford Row (indicative site location shown by red circle).

4. Proposals and Assessment of Impact

This section should be read in conjunction with Trehearne Architects' drawing pack, gazetteer and Design and Access statement.

Proposals

The proposals seek to convert the buildings back to their original use, from office to residential. This would involve physically separating the two so they read as individual buildings as they were originally. Where possible, rooms have been left in their original configuration and have been allocated traditional uses on the principal floors. 20th Century additions are proposed to be removed including false ceilings and sanitary arrangements.

The height and staircase configuration of the buildings dictates that a sprinkler system must be introduced to satisfy Building Regulations. An agile misting systems is proposed as it can be wall mounted (typically above doors) and is less intrusive and would cause less water damage than conventional systems if needed. Where needed, original doors to the staircase, which will be required to offer fire protection, will be upgraded using intumescent systems.

Externally, the rear lightwells to the basement would be reopened to establish the original integrity of the rear elevation and create a clear articulation between the original buildings and subsequent extensions. Importantly the interventions would reintroduce natural light and air to the basement as originally intended. It is also proposed to remove the pitched roof to the rear single storey extension and replace it with a flat roofed garden area.

Assessment of Impact

General

The return of the buildings to their original use as single family dwellings, would help realise their optimum viable use (as per the wording of the NPPF) and would have a **beneficial impact**. A mist sprinkler system is proposed to the staircase and modern service riser is proposed to the rear room rising up the height of the building. These changes are necessary to make the building meet 21st century standards, and would not detract from the key significance of the building, resulting in a **neutral impact**. Modern windows to the rear of the building are proposed to be replaced with more sympathetic replacements, resulting in a **beneficial impact**.

Basement

There are a mixture of proposals at this level that have both beneficial and negative impacts on the historic plan form of the building. In terms of beneficial impacts, it is proposed to reinstate the front room party wall to its original position, the stair is proposed to be reintroduced to No. 53, lightwells reintroduced to the rear of both properties and lateral openings blocked up so both properties read as individual structures. All these benefits would have a considerable **beneficial impact** at this level. A small number of harmful impacts are proposed to meet the needs of modern living, including the compartmentalisation of the rear rooms to facilitate bedrooms with en-suites. This would result in a **very low level of harm** which would be easily outweighed by the other benefits at this level.

Ground Floor

Minimal changes are proposed to the historic parts of the building at this level as a result of their sensitive nature. The key changes would be the reintroduction of a lightwell to the rear, which would help to separate the historic elements of the building from the modern, resulting in a **beneficial impact**. Lateral connections between the buildings including in the front principal room of No. 54 and hallway of No. 53 would be blocked up, helping to restore the original layout of the building resulting in a **beneficial impact**. No. 53 would have a new stair connection to the basement level, helping to restore the historic plan form having a **beneficial impact**. Other changes at this level are minor in nature and would have **no impact**.

4. Proposals and Assessment of Impact

First Floor

Few changes are proposed at this level, reflecting its more sensitive nature. The removal of the lateral opening between the two floors of the landing would help restore the original floor plan resulting in a **beneficial impact**. Both front and rear rooms are proposed to be connected to one another through the spine wall. There is evidence that they were connected historically so this would result in a **neutral impact**.

The proposed removal of the 1980s hipped roof to the single storey structure to the rear would help open up views of the rear elevation and result in a **beneficial impact**.

Second floor

It is proposed to turn this level into the master suite. As part of this, new openings will be made between the front and rear rooms and the rooms to the front of the building. These changes would cause a slight erosion of the historic circulation spaces of the building, resulting in a **low level of harm**. However, existing harmful elements at this level would also be removed including the kink in the walls to front rooms, lateral connection between the two buildings and the modern corridor to No. 54, resulting in **beneficial impacts**. The harm at this level is considered to be outweighed by these benefits.

Third floor

The changes at this level see a number of benefits including the removal of the lateral connection and insertion of staircase to No. 54. These would both have **beneficial impacts**. Other changes at this level are relatively minor in nature to allow the provision of new bathrooms to the smallest rear rooms and a new bathroom to the front room of No. 54. No elements of interest will be affected by these changes and would result in a **neutral impact** therefore.

The changes are considered to provide a **beneficial impact** on the conservation area through improvements to the rear elevation and removal of the roof of single storey structure.

Summary

The proposals would provide a considerable opportunity to return the buildings back to their original use and restore key features and plan form of interest. As part of this, opportunities have been taken to reinstate original features. These changes provide the opportunity to enhance the significance of the listed building and character and appearance of the conservation area, and we see no heritage reason why Camden Council should not view the proposals favourably.

Appendix 1: Legislation, Planning Policy and Guidance

Legislation

Legislation regarding Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (the 1990 Act).

Section 16(2) states that in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 66(1) states that, in considering whether to grant planning permission for development that affects a listed building or its setting, the local planning authority (LPA) or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest that it possesses.

Section 72(1) states that, in the exercise of planning functions, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

The term “preserve”, within the context of Section 66, has been defined within *South Lakeland District Council v Secretary of State [1992]*, where it was held that the “desirability of preserving” creates a presumption against harmful changes, but not a presumption against any change. Case law has established that the preservation of the setting of a listed building requires considerable importance and weight (i.e. the Barnwell Manor judgment) and that a decision-maker who has worked through the paragraphs of the NPPF in accordance with their terms will have complied with the statutory duty set out in the 1990 Act (i.e. the judgment in *Jones v Mordue & Others [2015]*).

In the judgment for *Palmer v Herefordshire Council* ([2016] EWCA Civ 106), a discussion on the balance between harm and benefit to a listed building was undertaken. It was accepted that “where proposed development would affect a listed building or its settings in different ways, some positive and some negative, the decision-maker may legitimately conclude that although each of the effects as an impact, taken together there is no overall adverse effect on the listed building or its setting”. In essence, where there is some harm and some benefit, these should be given the same weight, and where they are equal in measure, the effect on the listed building would be neutral, and thus its significance would be preserved.

This approach was confirmed in *City & Country Bramshill Ltd v Secretary of State for Housing, Communities And Local Government & Ors [2021]*. In this case Lord Justice Lindblom concluded that ‘the considerable importance and weight to the desirability of preservation [of the special architectural or historic interest of a listed building or its setting], should tip the scales to produce an unequal balance in its favour. However, the SoS should still take account of the actual severity of any change, or scale of change as the Mayoral SPG puts it, and so the extent of impact, as well as the relevance to its significance, and the

importance of the asset. The overall weight to be given to any harm, and the conflict with policy, should be a product of these factors.’

National Planning Policy Framework (2024)

The policies relevant to heritage are outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’. The NPPF places much emphasis on ‘significance’ which it defines as:

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

The NPPF directs local planning authorities to require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting and the level of detailed assessment should be ‘proportionate’ to the assets’ importance. (Paragraph 194).

Paragraph 207 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, ‘to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal’.

Paragraph 212 requires that ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “clear and convincing justification” (Paragraph 213). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

Paragraphs 214 and 215 discuss different levels of harm caused to heritage assets and requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of non-designated heritage assets. In relation to non-designated heritage assets, paragraph 216 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset.

With regards to conservation areas and the settings of heritage assets,

paragraph 219 requires Local Planning Authorities to look for opportunities for new development to enhance or better reveal their significance.

Planning Practice Guidance

This guidance supports the NPPF and reiterates the importance of conserving heritage assets in a manner appropriate to their significance. Key elements of the guidance relate to assessing harm. An important consideration should be whether development proposals adversely affect a key element of the heritage asset’s significance:

‘it is the degree of harm, rather than the scale of development that is to be assessed’. The level of ‘substantial harm’ is stated to be a high bar, which may not arise in many cases. Whether development proposals cause substantial harm will be a judgment in the decision-taking process, having regard to the circumstances of the case and by applying the relevant NPPF policies. Such harm may arise from works to the heritage asset or from development within its setting. Setting is defined as:

the surroundings in which an asset is experienced, and may be more extensive than the curtilage.

A thorough assessment of the harm development proposals will have on this setting needs to consider, and be proportionate to, the heritage asset’s significance and the degree to which any changes enhance or detract from that significance, and the ability to appreciate and experience it.

Regional Planning Policy

The London Plan (2021)

Key extracts from the London Plan relating to this application are outlined below:

Policy D1 London’s form and characteristics

A. Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:

Form and layout

- 1) use land efficiently by optimising density, connectivity and land use patterns
- 2) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

Quality and character

- 12) respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local

Appendix 1: Legislation, Planning Policy and Guidance

character

13) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.

Policy HC1 Heritage conservation and growth

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 seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Planning Policy

Camden Local Plan 2017

Relevant policies include:

Policy D1 Design states the Council will seek to secure high quality design requiring, *inter alia*, that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- e. comprises details and materials that are of high quality and complement the local character;

Policy D2 Heritage seeks to preserve and where appropriate, enhance heritage assets and their settings. It states that:

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

Camden Planning Guidance, Design (January 2021)

This guidance supports the local plan and provides information on detailed design issues including design excellence and heritage, and supports policies D1 and D2 in the Camden Local Plan.

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

This document outlines the significance of the area, its sensitivities and opportunities for enhancement.

Guidance Notes

Conservation Principles, Policies, and Guidance (English Heritage, April 2008)

This document outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in their own advice and guidance through the planning process, the document is commended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. This document was published in line with the philosophy of PPS5, yet remains relevant with the NPPF and PPG, the emphasis placed upon the importance of understanding significance to properly assess the effects of change to heritage assets. Guidance within the document describes a range of 'heritage values' that constitute a heritage asset's significance to be established systematically; the four main heritage values include: aesthetic, evidential, communal or historical. The document emphasises that:

considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment

Historic Environment Good Practice Advice in Planning Notes

GPA 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-making in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that:

...application proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

This document outlines the significance of the area, its sensitivities and opportunities for enhancement.

- Understand the significance of the affected assets;
- understand the impact of the proposal on that significance;
- avoid, minimise, and mitigate impact in a way that meets the objectives of the NPPF
- look for opportunities to better reveal or enhance significance;
- justify any harmful impacts in terms of the sustainable development objective

of conserving significance and the need for change;

- offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that direct physical change may affect heritage assets, or by change in their setting. Assessment of the nature, extent, and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of application proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

GPA 3: The Setting of Heritage Assets (December 2017) (2nd Edition)

This advice note focuses on the management of change within the setting of heritage assets. This guidance updates that previously published by English Heritage (The Setting of Heritage Assets 2011) in order to ensure that it is fully compliant with the NPPF and is largely a continuation of the philosophy and approach of the 2011 document. It does not present a divergence in either the definition of setting or the way in which it should be assessed.

Setting is defined 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'. The guidance emphasises that setting is not a heritage asset or a heritage designation and that its importance lies in what it contributes to the significance of the heritage asset itself. Elements of setting may make a positive, negative or neutral contribution to the significance of a heritage asset.

While setting is largely a visual concept, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors, including historic associations.

This document states that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset. It is further stated that the contribution made to an asset's significance by their setting will vary depending on the nature of the asset and its setting. Different heritage assets have the capacity to accommodate changes and, therefore, setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, Historic England recommend using a '5-step process' to assess any effects of a development proposals on the setting and significance of a heritage asset:

Appendix 1: Legislation, Planning Policy and Guidance

- Identifying the heritage assets affected and their settings;
- Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Assessing the effect of the development proposals on the significance of the heritage asset(s);
- Maximising enhancement and minimising harm;
- Making and documenting the decision and monitoring outcomes.