

HeritageCollective LLP

Heritage Assessment



22 King's Mews, London

On behalf of Queens Gate Holdings Limited

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1.0 INTRODUCTION

Background

- 1.1 This Heritage Assessment has been prepared by Heritage Collective LLP on behalf of M. and R. Matharu. It relates to the redevelopment of land at 22 King's Mews, London, within the Bloomsbury Conservation Area.
- 1.2 Pre-application advice from The London Borough of Camden is, unsurprisingly, that the adjacent 20th century commercial building at 23 and 24 King's Mews does not make a positive contribution to the character and appearance of the conservation area. Demolition of the modern building on this part of the site is unlikely to be an issue, subject to the grant of conservation area consent and the attendant design of an acceptable replacement structure.
- 1.3 On the other hand, demolition of the older mews building at 22 King's Mews has been flagged as a point of issue in the pre-application advice. This report concentrates on the assessment of the contribution of 22 King's Mews to the character and appearance of the Bloomsbury. It examines the extent to which the heritage significance of the conservation area, as a designated heritage asset, would be affected by the removal of the historic structure.
- 1.4 55 Gray's Inn Road is the nearest listed building to the site, being located on the north-east part of the block. It is not physically affected by the proposal, and the development will not affect the setting of the building in any way that would require consideration under planning legislation or policy.
- 1.5 Expressions such as "positive contributor" and "detractor" are sometimes used in appraisals when referring to unlisted buildings in conservation areas. They have been avoided wherever possible in this report, which seeks to establish the heritage significance and importance of 22 King's Mews and its immediate surroundings in accordance with policy and guidance.
- 1.6 A site visit was undertaken on 12 September 2012 in good weather.

Legislation and Policy

- 1.7 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision makers in the planning process to pay special attention to the desirability of preserving the character or appearance of conservation areas. This is a duty imposed on the decision maker, not a requirement that the character or appearance of a conservation area should be preserved.
- 1.8 Part 12 of the National Planning Policy Framework (the Framework) addresses the conservation and enhancement of the historic environment. Paragraph 129 requires local planning authorities to identify and assess the “particular” significance of any heritage asset that may be affected by a proposal. This should be taken into account so as to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.
- 1.9 Paragraph 131 of the Framework asks local planning authorities to take account of three more factors, namely:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 1.10 It is important to read the above bullet points carefully. Sustaining and enhancing the significance of the Bloomsbury Conservation Area is a consideration, as is the sustainability of its community and its economic vitality. It should not be assumed that the first two bullet points are to be treated narrowly in the context of preserving one building, although the heritage significance of 22 King’s Mews is clearly part of the overall balancing exercise.
- 1.11 Paragraph 138 of the Framework states that loss of a building (or other element) which makes a positive contribution to the significance of a

conservation area should be treated as harm under either paragraph 133 or 134, both of which are discussed further below. Again, it is important to read paragraph 138 carefully, particularly in respect of the following three factors:

- i. The paragraph does not suggest that an unlisted building is or should be treated as a designated heritage asset. The wording differs from paragraph 187 of the Draft Framework.
- ii. The paragraph is not restricted to unlisted buildings within conservation areas, so when taking into account relative significance there is the potential for a considerable range within which some elements will be much more important than others.
- iii. The words "...taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area..." clearly direct the decision maker to exercise judgement, proportion and balance.

1.12 Turning back to paragraphs 133 and 134 (and 132) which deal with levels of harm, the essential points are as follows:

- i. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset (in this case the Bloomsbury Conservation Area), this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- ii. Where a proposal will lead to substantial harm to or total loss of significance of a designated heritage asset (again, the Bloomsbury Conservation Area in this case), local planning authorities should refuse consent, 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:
 - The nature of the heritage asset prevents all reasonable uses of the site; and

- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some other charitable or public ownership is demonstrably not possible; and
- The harm or loss is outweighed by the benefit of bringing the site back into use.

1.13 In the event that paragraph 133 (substantial harm) is applied by the decision maker, it should be noted that the first and third bullet points above refer to the use of the site, not the use of the present building.

1.14 The points relating to viable uses in paragraphs 133 and 134 are not applicable to the conservation area as a designated heritage asset, but they have been considered in relation to site-specific harm resulting from the application itself, as advised in paragraph 138 of the Framework.

1.15 English Heritage has produced guidance on the designation and management of conservation areas, of which the most immediately relevant consideration is a series of questions intended to help to establish whether a building makes a positive contribution to the character and appearance of a conservation area. These questions, which originated in paragraph 4.4 of the now-cancelled PPG15, are a starting point for this process - provided it is understood that they are guidelines, not criteria, and that the effects of erosive alterations must be taken into account. They should not be treated as a points scoring exercise, and it is relevant to point out that some of the questions concentrate heavily on superficial similarities with other buildings (e.g. similar materials) which are not necessarily helpful when making qualitative judgements about value and significance. The questions are addressed in the following assessment.

1.16 In April 2011 the London Borough of Camden produced a detailed assessment of the Bloomsbury Conservation Area which noted the diversity and complexity of its character, appearance and historic development. The character of mews buildings was summarised in paragraph 3.9 of the document as being a “common theme” across the area. Paragraph 5.190 of the appraisal specifically refers to the positive contribution made to the

character and appearance of the conservation area by 20-22 King's Mews as a group.

2.0 22 KING'S MEWS

Evidence from maps and historic documents

- 2.1 Sources in the London Metropolitan Archives and Bishopsgate Institute Archives were consulted, and street directories between 1870 and 1970 were examined at ten year intervals. From 1870 until 1890 only one occupant is named in King's Mews – William Banks, who operated a commission stables. The business was taken over by Fred Banks between 1900 and 1920. From 1940 until 1970 the two properties to the north of the application site, 20 and 21 King's Mews, were occupied by Fred Whitbread, motor engineer, a use that has continued to this day. 22 King's Mews is not specifically identified in these directories.
- 2.2 Goad insurance maps dated 1939 and 1957 both state that 22 King's Mews was at that time in use as a garage. On that basis it is probable that it was in commercial use as a stable from 1870 until about 1920, and that it was used as a garage from 1920 until the late 20th century. In 1959 it may have been internally linked to the commercial garage to the north, which is also suggested by physical evidence within the building described below. The use of 22 King's Mews before 1870 is not known, but it was in all probability a commercial or private stable. The precise date of construction has not been established.

Description of 22 King's Mews

- 2.3 22 King's Mews can be described as a red brick mews building with later stock brick alterations, probably built as a stable in the early 19th century, with a hipped roof now covered in interlocking concrete tiles. The front elevation, which has been painted white, has two asymmetrical timber sash windows at first floor and a larger blocked opening with a blue painted timber frame for vehicles at first floor, now containing a pedestrian door. To the left of the downpipe is a further mews building of broadly similar style and appearance at 20 and 21 King's Mews.
- 2.4 The interiors are open from front to back, and there is an open-tread timber staircase from first to second floor, probably of early 20th century construction. There is an internal doorway into 23 King's Mews at ground

floor, and there is further evidence of blocked openings in both party walls on both floors. The first floor structure may be an Edwardian repair or rebuilding, judging by the nature of the spine beam, posts and braces visible at ground floor level. There is a blocked hatch or window in the rear elevation at ground floor.

- 2.5 There is an inserted internal chimney breast within the back wall which rises above the roof ridge to the rear of the building, containing a blocked fireplace, apparently of mid-19th century date. An Edwardian fireplace with Art Nouveau detailing has been inserted in another chimney within the right hand flank wall at first floor. The hipped roof structure, which is of thin scantling, has a late Georgian appearance internally, with queen struts from the beams to the purlins and with iron straps at some joints.
- 2.6 The building has the general appearance of having been erected in the early 19th century as a stable, and of having been upgraded in the early 20th century for motor garage use. It is probable that the former vehicular opening on the ground floor front elevation dates from about 1900.

Character and appearance

- 2.7 The external character and appearance of 22 King's Mews is similar to that of 20 and 21 King's Mews to the north, being a simple facade with small openings and a high proportion of solid to void.

Architectural interest

- 2.8 Architecturally, there is some archaeological interest in the internal fabric. There is also a skin-deep architectural connection between 22 King's Mews and the neighbouring building to the north known as 20 and 21 King's Mews, evident in the broad similarity between the treatment of the front elevations

Historical interest

- 2.9 Mews buildings are of general historical interest, and this particular example has a documented past as a commercial stable and garage. However, there are no special historical connections of particular note.

Aesthetic value

- 2.10 At a quick glance there is some aesthetic value in the group between 20 and 22 King's Mews, which is recognisably a late Georgian or early Victorian mews terrace despite later alterations and uses.

Evidential value

- 2.11 The evidential (archaeological) interest of the building is more apparent internally where there are clear examples of blocked doorways and alterations. Externally it is recognisably an example of an early 19th century mews structure.

Communal value

- 2.12 There is no particular communal value or interest attached to this building.

Contribution to the character, appearance and significance of Bloomsbury

- 2.13 Turning to the list of questions posed by English Heritage when assessing the contribution made by unlisted buildings to the character and appearance of conservation areas, the answers in respect of 22 King's Mews are as follows :

- **Is it the work of a particular architect or designer of regional or local note?** *No.*
- **Does it have landmark quality?** *No.*
- **Does it reflect a substantial number of other elements in the conservation area in age, style materials, form or other characteristics?** *Yes in a general sense that the conservation area contains other brick buildings dating to the early 19th century, but no in the sense that most of the other characteristic mews buildings here have been taken down – with the possible exception of parts of the facade of 20 and 21 King's Mews.*
- **Does it relate to adjacent heritage assets in age, materials or in any other historically significant way?** *Yes, insofar as the front*

elevation is superficially similar in age and style to 20 and 21 Kings Mews immediately to the north.

- **Does it contribute significantly to the setting of adjacent designated heritage assets?** *No, there are no adjacent designated heritage assets.*
- **Does it contribute to the quality of recognisable spaces, including exteriors or open spaces with a complex of public buildings?** *No.*
- **Is it associated with a designed landscape?** *No.*
- **Does it, individually or as part of a group, illustrate the development of the settlement in which it stands?** *Yes.*
- **Does it have significant historic association with features such as the historic road layout, burgage plots, a town park or a landscaped feature?** *Yes, to the extent that the name of the street and its subservient character to the adjacent parallel streets is a reminder of the former mews function. The noticeable transition in enclosure, noted in paragraph 3.13 of the Council's appraisal of the conservation area, is relevant.*
- **Does it have associations with local people or past events?** *No significant associations.*
- **Does it reflect the traditional functional character or former uses in the area?** *Yes, it is recognisably a mews building.*
- **Does it contribute to the character or appearance of the area?** *The front elevation makes some contribution in conjunction with the adjacent facade at 20 and 21 King's Mews, but the building as a whole is not of particular heritage value to the character and appearance of the Bloomsbury Conservation Area.*

Statement of significance

- 2.14 The result of the assessment is inconclusive in that most of the building is invisible for the purposes of any practical contribution to the character and appearance of the Bloomsbury Conservation Area. It is only the superficial connections between the facades of 20 to 22 King's Mews that can be regarded as being of any noticeable heritage value for planning policy purposes.
- 2.15 In assessing the facades, it is relevant to note that there has in fact been a considerable amount of rebuilding and repointing over the years, and that the thick layers of white paint cover a number of problems in the case of 22 King's Mews. The sash windows at first floor are late 19th or early 20th century replacements with horns, and the blocked vehicular opening is almost certainly a later insertion. For almost all modern purposes the light admitted by these openings is unsuitable, and the other three walls of the building are landlocked. Residential conversion of the fabric in its present form would be attended with a number of practical issues.
- 2.16 While it could reasonably be concluded that the superficial appearance of the facade of 22 King's Mews makes a positive contribution to the character and appearance of the conservation area, there are complications. Significantly, the building as a whole does not make such a contribution, even if it is in some limited respects of some architectural and evidential interest to specialists. There are clear problems associated with the future beneficial use of the whole building, and its preservation is less important than the need to preserve and enhance the character and appearance of the wider area.

3.0 PROPOSED REDEVELOPMENT

Introduction

- 3.1 It is proposed to demolish 22 King's Mews and to erect a self contained dwelling on four floors, one being an additional upper storey and the other being a new basement storey. Pre-application advice from the Council is that there is no particular issue with the demolition of 23 and 24 King's Mews which are concluded to make a neutral contribution to the character and appearance of the Bloomsbury Conservation Area. The pre-application advice states:

"In contrast, number 22 is a much earlier mews building with much more historic character. It is noted that number 22 was excluded from the original wider redevelopment scheme on officer advice as it was considered to make a positive contribution to the conservation area."

Whilst it is acknowledged that historic mews buildings were demolished on the opposite side of the street (14-17) when the scheme was granted at appeal, planning policy and guidance has changed since this time. Those buildings were included under a conservation area statement dating from 1998 which categorised them as making a neutral contribution to the area. Since then the Bloomsbury Conservation Area Appraisal and Management Strategy 2011 has been adopted which lists this building as making a positive contribution and therefore the building should be retained."

- 3.2 There are some inaccuracies in the pre-application advice regarding the appeal into the site at 14-17 King's Mews, more correctly known as 7 Northington Street and 14-17 King's Mews, a decision by Inspector Andrews dated 14 June 2010 and involving two applications with the references APP/X5210/A/10/2212792 and APP/X5210/E/10/2122803.
- 3.3 The first of these inaccuracies is that while there has been a change in planning policy and guidance since June 2010, there has been no substantive change in national heritage policy that would alter the approach to that case or any other similar case. The policies in force at that time within PPS5 were sufficiently similar to those in the current Framework that they are effectively

interchangeable for the purposes of applications affecting the redevelopment of unlisted buildings in conservation areas.

- 3.4 There is a further inaccuracy regarding the basis on which the 2010 decision was made. Paragraphs 9 to 13 of the decision letter make it clear that the Inspector made the decision on the basis that the Council's view was that the buildings involved in that appeal made a positive contribution to the character and appearance of the conservation area as it was at that time. There has been a change to the designation of the conservation area since 2010, and a change in the assessments of significance, but that does not in itself amount to a change in the way planning policy and guidance is applied. Therefore, the relevant point is that the decision in the 2010 appeal was based on a judgement about significance by the Inspector, within essentially the same policy framework that exists today.

Demolition of an undesignated heritage asset

- 3.5 When regarded as an undesignated heritage asset for the purposes of paragraph 135 of the Framework, 22 King's Mews is of less than local merit. It has little or no "particular" heritage significance as described in paragraph 129 of the Framework. Therefore, there should be no presumption in favour of its preservation for its own sake.

Impacts on designated heritage assets

- 3.6 The significance of the Bloomsbury Conservation Area would be almost unaffected by the demolition of 22 King's Mews. The Council's appraisal, demonstrates that Bloomsbury has a robust historic environment that can absorb well managed change and minor levels of harm provided that these are balanced with other public benefits.
- 3.7 Most if not all appeal decisions since March 2010¹ have treated the demolition of unlisted buildings in conservation areas as causing less than substantial harm, even where those buildings were acknowledged to make a positive contribution to those areas. There is nothing in this particular case which would suggest that there would be substantial harm to the significance of the

¹ The date when PPS5 (now replaced by the NPPF) brought in the two concepts of substantial harm and less than substantial harm.

Bloomsbury Conservation Area, so paragraph 133 (and the second part of paragraph 132) of the Framework does not apply. In the event that the decision maker disagrees with this conclusion, and applies paragraph 133, it is relevant that:

- The nature of the heritage asset prevents all reasonable uses of the site. The landlocked site and the impractically small openings on the front elevation are significant impediments to reuse.
- No viable use of the heritage asset itself has resulted from marketing. Conservation of the building fabric itself is not justified, but even if this approach were to be taken, grant-funding or some other charitable or public ownership is demonstrably not possible given that the site is in private ownership.
- The loss of the existing building amounts to only a very small level of harm to the designated heritage asset (the conservation area), and this loss can be outweighed by the benefit of bringing the site back into use.

3.8 In summary, the relatively minor harm arising from the loss of evidential and architectural significance can be outweighed by the benefits of bringing the site back into viable use, contributing to the economic vitality of a sustainable community, and by making a positive contribution to local character and distinctiveness. Adverse impacts on the Bloomsbury Conservation Area will be slight, and the opportunity will arise for significant and material enhancement.

3.9 There will be specific mitigation in form of the reconstruction of the front elevation of 22 King's Mews to a form as close as possible to its present appearance, subject to the detailed treatment of the former vehicular opening which is itself an alteration.

4.0 CONCLUSIONS

- 4.1 Some architectural, evidential and historical significance must be acknowledged in 22 King's Mews, but the structure is landlocked and impractical to use. There is no clear-cut presumption in favour of the preservation of the building for its own sake when compared with the strategic objective of planning for the enhancement of the wider area.
- 4.2 Demolition of the building will have a minor impact on the significance of the Bloomsbury Conservation Area, which is robust enough to sustain and absorb levels of change on this scale. The front elevation will be reconstructed to a condition as close as possible to its existing appearance, which will lessen the impact of the development on the character and appearance of the conservation area, and which will act in mitigation to the harm caused by demolition.
- 4.3 The minor harm arising from the loss of communal and historical significance can be outweighed by the benefits of bringing the site and the east side of the street back into viable use, contributing to the economic vitality of a sustainable community, and by making a positive contribution to local character and distinctiveness. Adverse impacts on the Bloomsbury Conservation Area will be slight, and the opportunity will arise for significant and material enhancement.



Plate 1: Front elevation with 20 and 21 King's Mews to the left



Plate 2: Front elevation



Plate 3: Window, front elevation



Plate 4: Window, front elevation



Plate 5: Detail of former opening, front elevation



Plate 6: Brickwork on the front elevation



Plate 7: Roof and chimney at the rear



Plate 8: The roof from the rear



Plate 9: Left hand flank wall, ground floor, looking west



Plate 10: Staircase from ground to first floor



Plate 11: Spine beam, post and braces, ground floor



Plate 12: Ground floor – blocked opening in rear wall



Plate 13: Edwardian fireplace, first floor, right hand side



Plate 14: Victorian chimney, blocked, rear wall



Plate 15: Blocked internal doorway to 21 King's Mews, first floor



Plate 16: Window and corbelled pier, first floor, front



Plate 17: Roof structure, first floor