

conservation should be'. Significance can be 'harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification.

- 5.16 Paragraph HE9.2 provides guidance for local planning authorities in instances where 'the application will lead to substantial harm to or total loss of significance' of a heritage asset or assets. It says that:

Where the application will lead to substantial harm to or total loss of significance local planning authorities should refuse consent unless it can be demonstrated that:

(i) the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss; or

(ii) (a) the nature of the heritage asset prevents all reasonable uses of the site; and

(b) no viable use of the heritage asset itself can be found in the medium term that will enable its conservation; and

(c) conservation through grant-funding or some form of charitable or public ownership is not possible; and

(d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.

- 5.17 HE9.4 deals with 'a harmful impact on the significance of a designated heritage asset which is less than substantial harm', and says that local planning authorities should:

(i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long-term conservation) against the harm; and

(ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.

- 5.18 Paragraph 111 of the Guide sets out the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 that local planning authorities when making

decisions must 'have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses' and 'pay special attention to the desirability of preserving or enhancing the character or appearance' of a conservation area.

- 5.19 Policy HE10, 'Additional policy principles guiding the consideration of applications for development affecting the setting of a designated heritage asset' deals with the setting of the heritage assets and urges local planning authorities to not just protect the setting of heritage assets, but to use the opportunity to cause development 'to better reveal the significance of the asset'.

Camden Council's Unitary Development Plan

- 5.20 Policy B7 of the UDP deals with conservation areas, and says:

A - Character and appearance

The Council will only grant consent for development in a conservation area that preserves or enhances the special character or appearance of the area. The Council will not grant planning permission for development outside of a conservation area that it considers would cause harm to the conservation area's character, appearance or setting.

B - Demolition of unlisted buildings

The Council will not grant conservation area consent for the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless exceptional circumstances are shown that outweigh the case for retention.

- 5.21 The commentary says that 'It is important that new buildings are designed taking into account the character and appearance of the conservation area they are in', and:

When a building is considered to make little or no contribution to the character or appearance of a conservation area, the Council will assess the contribution

made by any replacement building. The replacement building should enhance the conservation area to an appreciably greater extent than the existing building.

5.22 It also says that:

The architectural characteristics of a conservation area derive from, among other things, the detailing of existing buildings and the particular materials used in their construction. The Council will encourage the use of high quality and sustainable materials that complement and enhance the conservation area.

Guidance on urban design and the historic built environment

5.23 Section 7.4 of BS 7913:1998 'Guide to the principles of the conservation of historic buildings' says 'it is [also] frequently necessary for new buildings to be erected within historic settlements or conservation areas. In some circumstances, for example when there is an obvious or identifiable gap in a larger formal or informal composition, such new work may be positively desirable on broad architectural grounds; in other circumstances it is less desirable, but necessary'.

5.24 Paragraph 7.4.6 deals with 'criteria for new buildings in historic settings', and includes:

- Such buildings should be designed for a long life and soundly constructed of durable materials chosen to suit their context. They should be so planned that they are capable of alteration and adaptation in response to changing needs in the future.
- New buildings should be designed with due regard to their site and surroundings using materials that will weather and age well and settle into their place in the townscape.

5.25 The BS concludes this advice by saying: There can be no simple prescription for good architecture beyond the

Vitruvian precepts of 'commodity, firmness and delight'. Good new buildings in historic settings should not merely be fashionable or photogenic, but should stand the test of time. Mere conformity to restrictive formulae or the dressing of modern structures in traditional guises may fail to produce architecture of good repute'.

5.26 'By Design: Urban design in the planning system: towards better practice', produced by the Commission for Architecture and the Built Environment and the former DETR, provides guidance and recommendations regarding urban design.

5.27 The document deals in detail with how urban design can contribute to successful place-making, and the reinforcement of local character. It suffices here to list the 'Objectives of Urban Design' that it sets out:

- To promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture.
- To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas.
- To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people.
- To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport.
- To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around.
- To promote adaptability through development that can respond to changing social, technological and economic conditions.

- To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.

5.28 The English Heritage/CABE guidance 'Building in Context' expands on PPG15 to give further guidance on the design of new development which affects the historic environment, and particularly conservation areas. It sets out good practice guidance on the design of new development in historic areas. The guidance explains the importance of basing designs on thorough analysis of the context, and warns against the application of simple formulae such as 'fitting in' or 'contrasting the new with the old'. It advises that successful projects will:

- Relate well to the geography and history of the place and the lie of the land;
- Sit happily in the pattern of existing development and routes through and around it;
- Respect important views;
- Respect the scale of neighbouring buildings;
- Use materials and building methods which are as high in quality as those used in existing buildings; and
- Create new views and juxtapositions that add to the variety and texture of the setting.

5.29 The guidance contains a number of case studies and draw a number of specific conclusions from them:

- The best buildings result from a creative dialogue between the architect, client, local planning authority and others; pre-application discussions are essential;

- The local planning authority and other consultees can insist on good architecture and help to achieve it;
- Difficult sites should generate good architecture, and are not an excuse for not achieving it;
- With skill and care, it is possible to accommodate large modern uses within the grain of historic settings;
- High environmental standards can help generate good architecture;
- Sensitivity to context and the use of traditional materials are not incompatible with contemporary architecture;
- Good design does not stop at the front door, but extends into public areas beyond the building;
- High-density housing does not necessarily involve building high or disrupting the urban grain and it can be commercially highly successful;
- Successful architecture can be produced either by following historic precedents closely, by adapting them or by contrasting with them;
- In a diverse context a contemporary building may be less visually intrusive than one making a failed attempt to follow historic precedents.

6.0 The effect of the proposed scheme

- 6.1 This section of the report analyses the proposed development and describes the range of benefits it provides. The purpose of this section is demonstrate that the scheme will offer a very considerable amount of benefit while not affecting the essential contribution that Bentley House makes to the Bloomsbury Conservation Area.
- 6.2 This section, therefore, provides the substantive basis for the argument in the next section of the report that the scheme successfully achieves that balance sought by national and local policy guidance, and the character and appearance of the Bloomsbury Conservation Area is actually enhanced.

The design and how it responds to the Bloomsbury conservation area

- 6.3 The design is predicated on an analysis of the existing building and its contribution to the Bloomsbury Conservation Area. The basic point of departure is to decide to permit that contribution to continue by retaining the front portion of the building, and doing so in a meaningful way. As well as the two-dimensional qualities of the actual façade design, there is a strongly three-dimensional quality to building as it faces Euston Road. The set back to the screen wall and the towers cause the building to be seen in the round as well as appearing as a ‘street wall’.
- 6.4 The proposed additional accommodation respects this massing by placing itself in almost the same position as the existing, where it replaces the screen wall, albeit with an additional level added in a different treatment. The mass of the additional accommodation is set behind the key architectural elements of the existing design.
- 6.5 As pointed out earlier, the architectural expression of the additional floors to the Euston Road elevation draws upon

Curtis Green's design for Bentley House, and the proposal is based on the idea of extending his building in a manner that is consistent with its style and proportions. The first design approach, to provide a deliberate aesthetic contrast with the existing building so as to be clearly perceived as a later addition, has been altered so as to create a solution that is more integrated into the original design of the building.

- 6.6 The intention of the first approach was to avoid diluting or coarsening the integrity and completeness of the Curtis Green design. This is also achieved by the revised approach. There is no gratuitous pastiche involved, nor any pretence that more accommodation is being provided. Rather, the opportunity provided by the existing building is used: the lesser scale when compared with its neighbours, the lack of a satisfactory vertical termination to the composition, the blankness of the screen wall that does not seem to serve an architectural purpose that requires that much baldly empty wall.
- 6.7 The proposal will place new accommodation where the building offers the opportunity to do so, and avoid the pitfall of overstating its presence by either literal pastiche detailing or an over-wrought design. The greater height of the buildings to either side augments the appropriateness of adding set-back storeys to the building. The additional storeys will not over-sail other roofs, but be set between taller buildings.
- 6.8 The revised proposal works with the palette of materials used in the existing building, and does so in manner similar to that of the existing building. In contrast to the first scheme, no major new aesthetic or material is introduced. The new accommodation is in character with the existing building.
- 6.9 A better balance has been achieved in the sectional design. Rather than attempting to disappear, the additional accommodation accepts that it will be visible, and the replacement of the existing screen wall with three levels of accommodation in the same horizontal plane is

an honest and successful approach, made possible by being closer in spirit to the language of the existing building rather than trying to contrast with it.

The rear elevation

- 6.10 This elevation is, as discussed earlier, of notably lesser quality than that to Euston Road. It is not hard to see why Curtis Green made little of this façade: it is the secondary elevation of a storage building whose primary frontage was the only view of that the building that would be seen by the great majority of people. It is visibly utilitarian and mundane in design and in its making. Stephenson Way was never anything more than a small back street, and no architect of his period would have considered expending any significant time or his client's budget on making a grand statement. The brick used in the elevation is of very average quality, the Crittall glazing sits in functional rows (placed, curiously, at the outer edge of the opening in a position distinctly vulnerable to poor weathering), and there is minimal stone articulation.
- 6.11 The new elevation to Stephenson Way will replace this largely blank, dead façade with an active frontage. The contribution of the existing elevation to the conservation area – whose boundary it faces – is at best neutral. The proposed replacement is a high-quality, well-designed solution that is inherently better than what exists by providing an urbane and active street elevation. Its design is better proportioned and more urbane than that which exists. Retaining the Stephenson Way elevation – unlike the retention of the Euston Road elevation – would seriously compromise the creation of a successful new building.
- 6.12 The architectural information accompanying the application demonstrates the mismatch between the existing fenestration to Stephenson Way and a sensible, straightforward layout of the proposed new accommodation within the plan. It is simply not a question of providing less accommodation, and then the

scheme could be made work with student housing. Student accommodation – an entirely appropriate use in this location – is not provided in random configurations, with units sized in an arbitrary fashion: in a new building such as that proposed behind the Euston Road frontage, it is of necessity composed of repetitive units of a certain size and shape. It is not reasonably possible to have a rational layout involving such units, with sensible servicing and circulation, and ensuring that all units are properly day-lit... and then also accommodate specific variations simply to preserve an arrangements of unremarkable windows originally designed to admit light to large book storage rooms.

- 6.13 Nor is it right to do so for reasons of significance, because that significance is not present in sufficient quantity. It would be to wrongly confer upon the Stephenson Way elevation the same artistic or architectural interest as the Euston Road elevation to suggest that the scheme – the choice of use, the design and layout of accommodation – must be driven by the rear elevation as it is found. The Stephenson Way elevation of 200 Euston Road is simply not possessed of sufficient artistic, architectural or historic interest in itself to warrant such an approach, or to justify the making of its retention an overwhelming priority.
- 6.14 The substantial stylistic variety in Stephenson Way permits the design of this elevation to be individual in appearance, and the result will be singularly better than most of the buildings on the street – even the rear elevations of the listed buildings are unremarkable. Nonetheless, and in a manner consistent with the approach on the Euston Road frontage, the design ‘knows its place’ – the massing respects the scale of the street, and the height of the elevation remains below that of the listed building to the east. The building sets back at its top level.
- 6.15 The design of the new rear elevation relates subtly to that of the Euston Road elevation in its use of materials, in the use of the tall, narrow window device at upper level, and in the implied classicism of the symmetrical arrangement

of two pairs of window bays either side of the central pair of slightly wider window openings. An example of the well-poised nature and balance of the proposed design is that it presents itself in this way, but an over-formality that would be inappropriate to such a minor street is offset by the asymmetry of the stair position within the central pair of window openings. This design is far more harmonious and visually attractive than the bluntness and uniformity of the present façade.

Social and economic benefits

- 6.16 The proposed development will cause a redundant storage building to be redeveloped to provide student housing. The location of Bentley House is singularly unsuitable for the original purpose of the building: Euston Road cannot be used for delivery or picking up in any meaningful way, and Stephenson Way is a narrow street that cannot be negotiated by articulated trucks.
- 6.17 The scheme will create jobs and provide much-needed residential accommodation. It will bring life and vitality to a location badly in need of ground level activity, whereas Bentley House at present – and even when occupied – did not do this. The scheme creates upper floor, twenty four hour, residential use that ensures that life and activity – and the security and place-making that they bring – continues around the clock.
- 6.18 These benefits will be achieved while retaining that part of the building that makes the key contribution to the character and appearance of the Bloomsbury Conservation Area – the Euston Road frontage.

Sustainability and accessibility

- 6.19 The building does not lend itself easily to adaptation without substantial alteration. However, as well as allowing the building to continue to make its contribution to the Bloomsbury Conservation Area, the retention of the front portion of the building is a positive measure in sustainability terms. Similarly, The project will

create level access for mobility impaired persons where it does not exist at present.

Effect on other heritage assets

- 6.20 The view of the adjacent listed building (as shown on the cover of this report) will clearly affect the setting of the Grade II* building at 194 Euston Road/1 Melton Street, or rather the later 1930s part that is technically listed by virtue of its attachment to the listed building at the junction of Euston Road and Euston Square.
- 6.21 This effect will be highly positive. The present situation, as the image demonstrates, is of a strange and jarring mismatch in scale between 200 Euston Road and the exposed stock brick party wall of the adjacent building towering above it. The proposed scheme will remedy this situation and create a better, more harmonious relationship. The design of the new parts of the Euston Road frontage of 200 Euston Road will be such as to create a similarly harmonious between new and old, rather than a discernibly new 'part' to the unlisted building. This, in turn, will assist in creating a better context for the listed building.
- 6.22 To the rear, the new rear elevation will provide a greatly improved setting for the plainer back parts of the listed building. While the present rear elevation of 200 Euston Road could not be said to harm the listed building, it certainly contributes to the drabness and lifelessness of the back street. The more architecturally articulated nature of the proposal, and the life and activity that it will bring to Stephenson Way, will brighten and improve views of the listed building.
- 6.23 The effect of the proposed development on other nearby listed and unlisted buildings, and on the character and appearance of the Bloomsbury Conservation Area, is modest but positive. The contribution that the Euston Road frontage of 200 Euston Road makes to the Bloomsbury Conservation Area will be preserved by the proposed scheme, though the proposals will clearly alter

the appearance of the building. The main elements of Curtis Green's work - the main façade, the towers – will continue to be present in the streetscape, and continue to form part of the setting of the other buildings described earlier.

7.0 Compliance with policy and guidance

National policy

- 7.1 The proposed development is an example of what the new PPS seeks in terms of sustainability alone – by retaining the structure of an otherwise redundant building the scheme is inherently sustainable and less demanding of resources for its construction. The design of the external envelope and building systems within its new parts will also help the development achieve a high level of sustainability. The scheme is thus consistent with thrust of Policy HE1 of the PPS.
- 7.2 The scheme considers the surroundings of the site in a holistic fashion, and not in isolation. Very considerable thought has been given to the proposed scheme in terms of views along both Euston Road and Stephenson Way. Though preoccupied with the significance of 200 Euston Road itself, the character and appearance of the Bloomsbury Conservation Area and the setting of the adjacent listed building, the scheme will also enhance the setting of non-designated building such as the 1930s Wellcome Building at 193 Euston Road. It does this by understanding and responding to the nature of Curtis Green's design and using that to create a harmonious and coherent whole in the enlarged building.
- 7.3 In doing this the proposed scheme is both acknowledging the holistic approach of the PPS to the historic environment and helping to achieve those things that Policy HE3 seeks: that development is a 'catalyst for regeneration in an area', that the historic environment can be a 'stimulus' that can 'inspire new development of imaginative and high quality design', and the 'the re-use of existing fabric, minimising waste'.
- 7.4 The proposed development is consistent with Policy HE7 of the PPS. It 'take[s] into account the particular nature of the significance of the heritage asset[s, in its surroundings] and the value that [they] hold for this and future

generations’. This is demonstrated by the careful and detailed examination of the architectural qualities of the building which it is proposed to extend. In doing this, the scheme undoubtedly succeeds in ‘sustaining and enhancing the significance of heritage assets’, and utilises ‘their positive role in place-shaping’. It also clearly makes a ‘positive contribution to the character and local distinctiveness of the historic environment’

- 7.5 The scheme also does the things that the ‘Planning for the Historic Environment Practice Guide’ urges in its Paragraph 79. For the reasons explained earlier, the proposed development ‘sustains or enhances the significance of a heritage asset and the contribution of its setting’ by giving the site a new lease of life and by ensuring the preservation of those parts of the building of discernible significance.
- 7.6 The proposal clearly ‘reduces or removes risks to [the] heritage asset’. By proposing at this point in time to retain and reuse the significant elements of the building, it reduces the possibility of their full demolition being proposed at a later date.
- 7.7 Granting planning permission now for these proposals would prevent the building would undoubtedly ‘secure the optimum viable use of a heritage asset in support of its long term conservation’. The building, quite simply, does not lend itself easily to wide range of appropriate uses. Where a use such as hotel or office might be made to somehow work with the existing building, they would be questionable in land-use planning terms and difficult in practical terms. The building certainly cannot now function effectively for its original purpose of storage.
- 7.8 The proposed scheme will make ‘a positive contribution to economic vitality and sustainable communities’ by providing needed student housing, and is ‘an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment’ for the reasons given earlier. The scheme will help ‘better reveal the