

195-199 Gray's Inn Road, London Borough of Camden

Heritage Impact Assessment

July 2014



Contents

Page

3.	Summary and introduction
4.	Site description
4.	The site's setting and the heritage assets
5.	Site history
6.	The site's contribution to the conservation area and the setting of the listed buildings
6.	Assessment of the proposed building and its impact on the heritage assets
9.	Pre-application Advice
11.	The provision of house as a public benefit
11.	Assessment of national and local policy and guidance
18.	Conclusion
20.	Appendix 1

Summary and introduction

This Heritage Impact Assessment has been prepared on behalf of European Urban Architecture in support of a planning application for demolition of 195-199 Gray's Inn Road, London Borough of Camden, and replacement with a new building of similar scale. An earlier version was produced to help inform the design process and pre-application discussions.

The main purpose of this report is to assess the site's contribution to the conservation area and the setting of the listed buildings, assess the impact of the proposed building on the heritage assets and to consider whether the proposal complies with national and local policies relating the historic built environment.

It will be shown that 195-199 Gray's Inn Road makes a negative contribution to the character and appearance of the Bloomsbury Conservation Area by virtue of its poor quality modern design and materials. It will be demonstrated that the design of the proposed building sensitively responds to its historic context and will enhance the character and appearance of the conservation area and the setting of the listed buildings. For these reasons the proposal will be seen to comply with national and local policy and guidance regarding the historic built environment.

This report should be read in conjunction with the drawings, Planning Statement and Heritage, Design and Access Statement submitted by European Urban Architecture.

The author of this report is Kristian Kaminski MA (Architectural History). Following training as an architectural historian he acquired a broad range of experience while working in the Heritage Protection Department of English Heritage. Following this he worked as the Senior Conservation and Urban Design Officer for the London Borough of Lambeth, the Conservation Advisor for the Victorian Society and as Deputy Manager of the Design and Conservation Team for the London Borough of Islington. At the Victorian Society he fulfilled a national statutory role as a source of expert advice on Victorian buildings and their conservation and he began at Islington working on the English Heritage conservation grants scheme for Victorian shops (PSICA). He has worked on a range of major projects involving listed buildings and conservation areas. In a voluntary capacity has been an advisor to the Planning Committee of the Highgate Society, the Athlone House Working Group and the Stroud Green Conservation Area Committee. He sits on the committee of the influential conservation group SAVE Britain's Heritage.

Site description

The site fronts Gray's Inn Road and is occupied by a single-storey poor quality late C20 building with metal framed shopfronts. The building has been under utilised as a furniture showroom / storage and has a tired and neglected appearance.

The site's setting and the heritage assets

The existing building is of no special architectural and historic interest and is not a heritage asset in its own right.

The site is to the rear of nos.1-8 Mecklenburgh Street, a GII listed late Georgian terrace.

The site is opposite the Eastman Dental Hospital, built 1928-30 to the design of Sir John Burnet and Partners and Grade II listed.

In front of no.195 is a Grade II listed stone cattle trough dated 1885 and presented by the Metropolitan Cattle Trough and Drinking Fountain Association.

The site is within the Bloomsbury Conservation Area.

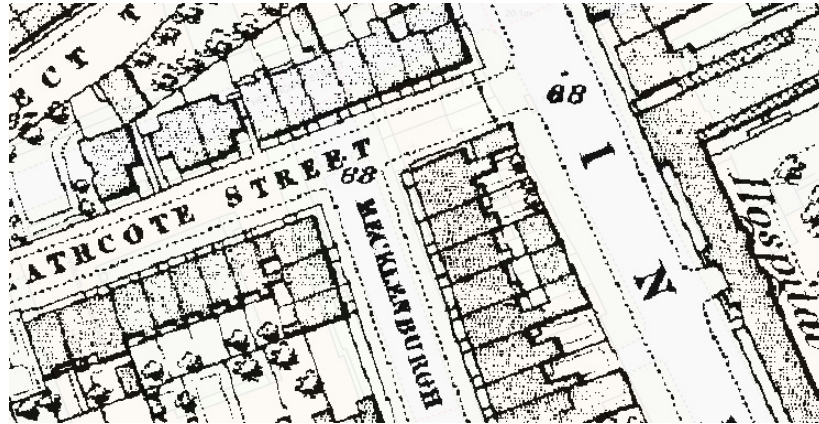
The *Bloomsbury Conservation Area Appraisal and Management Strategy* describes Gray's Inn Road as:

A wide, busy route linking High Holborn in the south to King's Cross in the north. It has a more varied character than the quieter side streets with a coarser grain where piecemeal development has occurred over the 19th and 20th centuries characterized today by a mix of commercial, community and hospital uses. The more recent buildings tend to be taller with larger footprints. Smaller scale 19th century buildings can be found close to the junctions with Frederick Street and Ampton Street on the east side between Cromer Street and the entrance to Argyle Square on the west side. There is greater variety in the materials used along Gray's Inn Road, particularly in the later developments which employ stone, glass, steel and concrete, although the predominant material is London stock brick. The architectural detailing also has consistent themes including strong vertical definition with the same rhythmic windows patterns and height as buildings in more residential parts of the sub area. (paragraph 5.247)

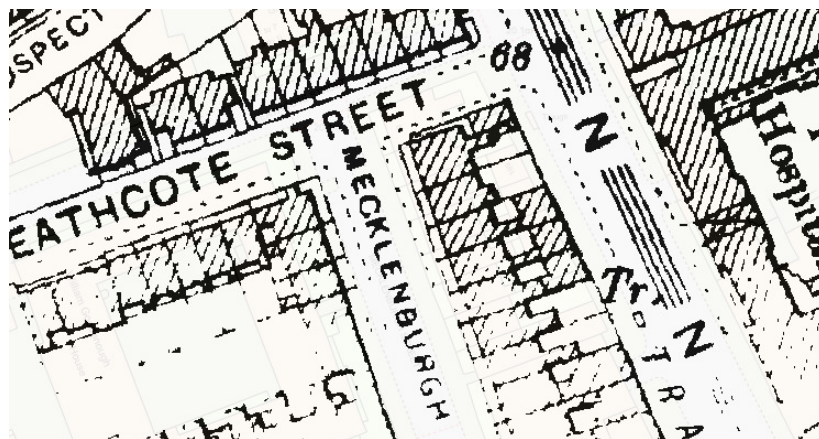
...This area has been blighted by vacancies in commercial uses and inappropriate signage, replacement windows and shopfronts. (paragraph 5.259)

Site history

1870 OS Map



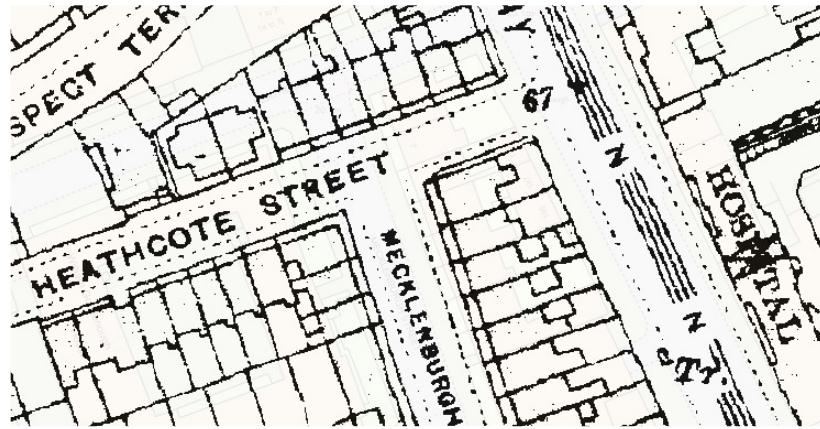
1896 OS Map



1898 Booth Map



1916 OS Map



1946 Photo

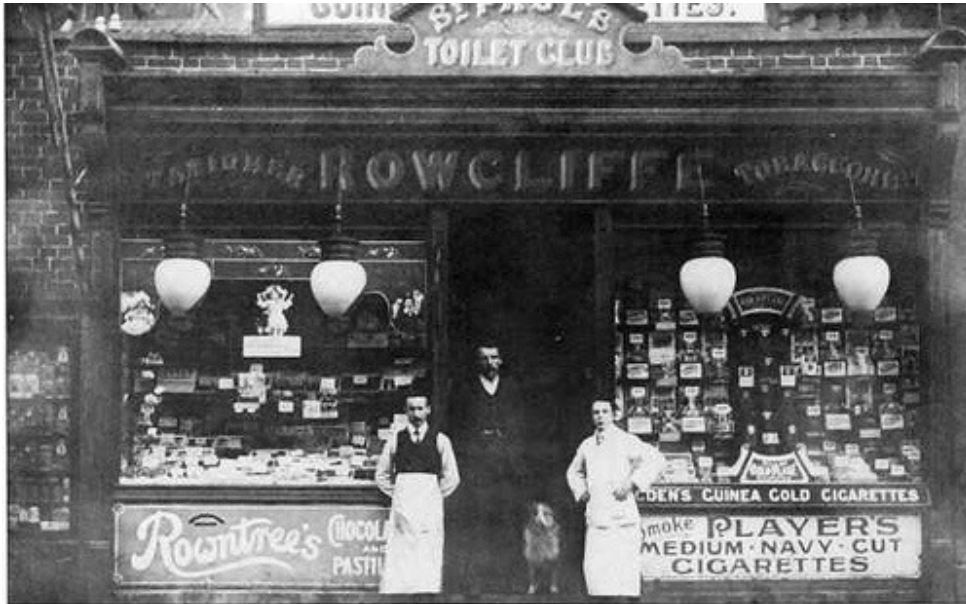


Three buildings of similar footprint to the existing appear on the OS map of 1870. Directories confirm that these were Victorian shops constructed to the rear of the earlier Georgian townhouses on Mecklenburgh Street.

The 1882 Post Office Directory, for example, lists no. 195 as a tobacconist (Robert Moore), no. 197 as a shirt and collar dresser (King Thomas Brinkley) and no.199 as a tobacconist (Rudolph Drucker) and Hardwareman (Inglis Henry).

Census records show that families of up to 6 individuals were living at each of nos. 195, 197 and 199 Gray's Inn Road in the Victorian period. This suggests that the original Victorian shops in this location must have been substantially taller buildings than that which exist today with residential accommodation above the shops – possibly with a mezzanine arrangement as was common.

No historic photographs of this section of the street are in the collection of the Camden Local Studies and Archives Centre but the shops are likely to have resembled typical modest shops of the period.



Above, an example of a Victorian tobacconist

The 1898 Booth's Poverty Map shows that the residents in the immediate vicinity of the site were between 'Fairly comfortable. good ordinary earnings' and 'middle class. well-to-do' but to the south of the site the residents were considered 'poor'.

The present buildings on the site date to the late C20.

The site's contribution to the conservation area and the setting of the listed buildings

The *Bloomsbury Conservation Area Appraisal and Management Strategy* notes that the area has 'been blighted by vacancies in commercial uses and inappropriate signage, replacement windows and shopfronts' (paragraph 5.259). Indeed as a poor quality late C20 building with metal framed shopfronts the site makes a negative contribution to the character and appearance of the conservation area. The site detracts from the setting of the GII listed nos.1-8 Mecklenburgh Street, Eastman Dental Hospital and cattle trough.

Assessment of the proposed building and its impact on the heritage assets

The proposal reinstates three high quality traditional timber shopfronts. The proposed design is likely to closely resemble the appearance of the shops that previously existed on the site in so far as their detailing includes all the features commonly found in most

Victorian shopfronts; paneled stallrisers, clerestories, fascias and pilasters. The proposed building has strong vertical definition and rhythm, an important characteristic of the area described in the *Bloomsbury Conservation Area Appraisal and Management Strategy*.

The removal of the existing poor quality late C20 metal framed shopfronts which make a negative contribution to the character and appearance of the conservation area and detract from the setting of the listed buildings and replacement with three high quality traditional timber shopfronts will enhance the character and appearance of the conservation area and the setting of the listed buildings. This enhancement is considered to be an important public / heritage benefit.

There is a negligible increase in height of 1m between the proposed building and the existing building which would be barely perceptible by the average passerby. The proposed building would be only slightly higher (34cm) than the advertising hoardings which exist to either side of the site and which in themselves make a negative contribution to the character and appearance of the conservation area and detract from the setting of the listed buildings. The proposed building will help relieve the negative impact which arises from the advertising hoardings. The negligible increase in height between the proposed building and the existing building will have no negative impact on the conservation area or the setting of the listed buildings. Even if it were to be considered that the height of the proposed building had some impact on the heritage assets any impact would be outweighed by the public / heritage benefit of the proposed building.

The design and scale of the proposed building is an example of high quality contextual urban design entirely appropriate for the area. However, even if the design and scale were to be questioned the *Bloomsbury Conservation Area Appraisal and Management Strategy* describes Gray's Inn Road as possessing a 'varied character... with a coarser grain where piecemeal development has occurred over the 19th and 20th centuries characterized today by a mix of commercial, community and hospital uses' which suggests that this part of the conservation area is less sensitive to change than other parts.



Above, the proposed traditional shopfronts

Pre-application Advice

Design and height initially considered acceptable

Pre-application advice from Neil Quinn, London Borough of Camden, dated 30 January stated:

"The replacement of the existing building... with a more traditional set of Victorian shopfronts, would be welcomed in design and conservation terms...

The increased height to the replacement building is also considered acceptable...

Concern over height and loss of views of the listed terrace arises

However, pre-application advice from Neil Quinn, London Borough of Camden, dated 17 March stated that the proposal was 'overly tall'. It should also be noted that the same advice stated that the proposal 'could be an improvement' in terms of the conservation area.

The height of the proposed building is 4.9m. In my view this cannot be considered 'overly tall' in the context of Victorian shopfronts in London in general or this specific site.

Census records show that families of up to 6 individuals were living at each of nos. 195, 197 and 199 Gray's Inn Road in the Victorian period. This suggests that the original Victorian shops in this location must have been taller buildings than that which exist today with residential accommodation above the shops – possibly with a mezzanine arrangement as was common.

House No.	Age	Sex	Name	Relationship	Occupation	Notes
195	40	M	Ernest P. Stale	Head	Woods Carver	X
197	40	M	Nary J. Stale	Wife	Manager of Laundry	X
		M	Wallis R. Stale	Son	Scholar	
		M	Alfred Stale	Son		
		M	Harry Stale	Son		
		M	Edith Stale	Daughter		
199	40	M	Henry Feasby	Head	Refinery of Boots & Shoes	X
		M	Constance A. Feasby	Wife	Assistant Cook	X
		M	Joseph Feasby	Son	Scholar	
		M	Edith Feasby	Daughter		

Above, 1891 census

Victorian shopfronts taller than 4.9m were, and still are, common in London.

For example see Appendix 1 for measured drawings showing 133 Upper Street at 5.04m, 290 Pentonville Road at 5.42m and Seven Sisters Road at 5.9m.

In discussion of precedent heights of Victorian shopfronts in the pre-application meeting held on 1st May 2014 Nick Baxter, Conservation Officer, explained that his concern that the proposal was 'overly tall' was due to the loss of views from Gray's Inn Road of the rear of the listed terrace on Mecklenburgh Street. However it is noted that the height of the proposed building will be an increase of only 1m on the existing. The existing and proposed views below demonstrate that the reduction in visibility of the rear of the listed terrace on Mecklenburgh Street will be negligible and imperceptible by the

average passerby. In any case the rear of Georgian terrace's were never intended to be viewed unlike their 'public' facades, the negligible reduction in views of the rear of the listed terrace will therefore not result in any harm to the heritage assets. The significance of the rear elevation of the listed terrace has also been undermined by inappropriate alterations such as C20 windows and patched brickwork.



Existing view looking south



Proposed view looking south



Existing view looking north



Proposed view looking north



A Victorian shopfront taller than 4.9m

The pre-application advice dated 17 March states that 'a building the same height as the hoardings could be more acceptable'. The proposed building is only 34 cm above the southern hoarding. In my view this is a negligible increase in height that will be imperceptible by the average passerby. In any case, the hoardings make a negative contribution to the area and to me it would seem better to me that the hoardings are subordinate (albeit only fractionally) to the proposed high quality traditional shopfronts which will make a positive contribution to the area as opposed to the other way round. In any case lowering the height of the proposed building will remove the possibility of providing three two bedroom residential units the public benefit this provides in terms of meeting housing needs.

I disagree that there are 'overly generous room heights' as stated in the pre-application advice from Neil Quinn, London Borough of Camden, dated 17 March. The room heights have been reduced to the absolute minimum possible height of 2.3m. In discussion of room heights in the pre-application meeting held on 1st May 2014 Nick Baxter, Conservation Officer, explained that he has been misinformed on the minimum for room heights.

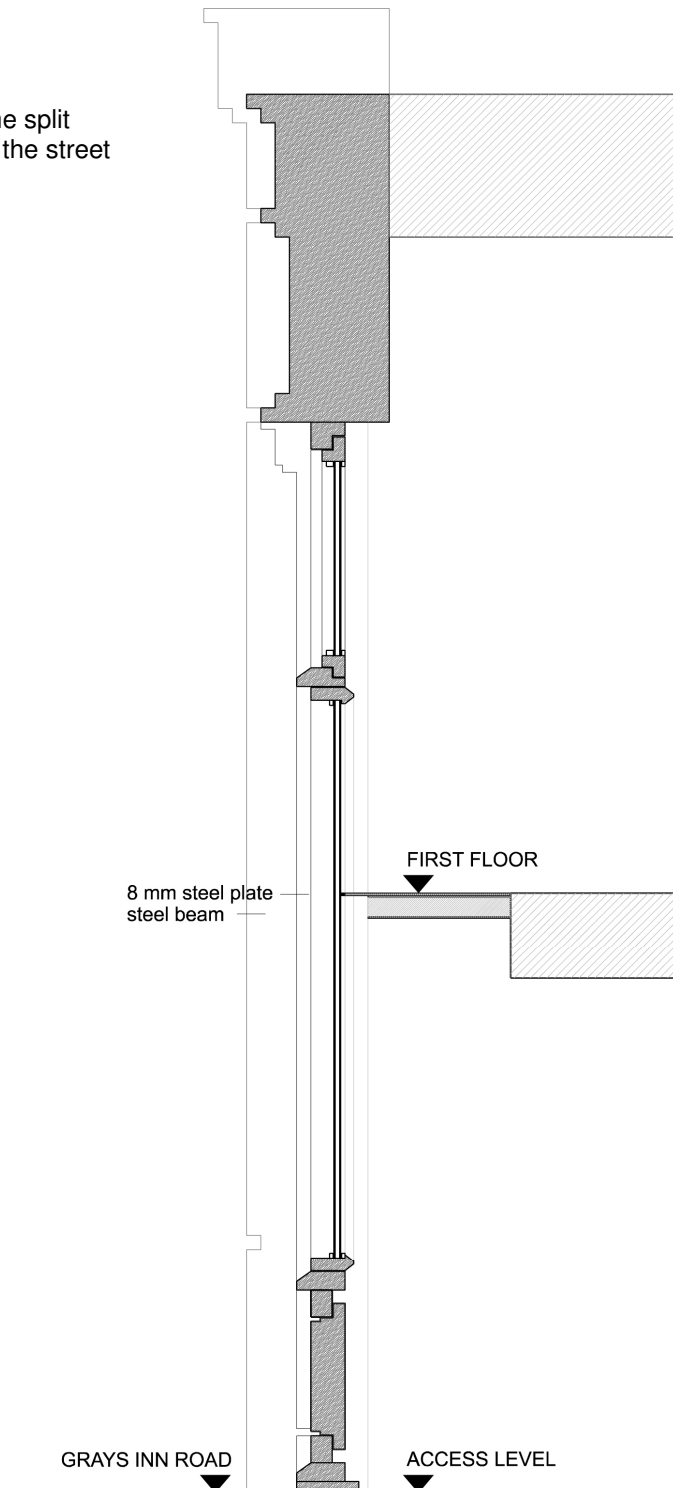
Concern over split-level visible within the shops / obscuring of glazing

Pre-application advice from Neil Quinn, London Borough of Camden, dated 17 March also raised concerns over the 'split-level arrangement that will be clearly visible within the shops' and obscuring of glazing.

The section of construction detail below shows how it is proposed that the 300mm floor is kept back from the glazing by approximately 500mm. At this point, the ceiling steps up

to provide a blind box 200mm high, up to the back edge of the timber mullion to the window frame. In between the mullions the gap between the two floors would be sealed by way of a 6mm thick steel angle. The glass remains unbroken and all one would see from the outside through the glass is the 6mm high silicone joint between the glass and steel. Consequently, the split levels would be barely perceptible by the average passerby.

Section of construction detail showing that the split floor levels would be barely perceptible from the street



The extent of proposed opaque film has also been reduced to simply the fanlights above the doors. However, in any case the use of blinds and opaque film is an accepted and successful method of maintaining a retail character but concealing / allowing other uses. There are many examples in the London Borough of Camden, including on Gray's Inn Road, where blinds/opaque film are features of shopfronts not only to conservation areas but also to listed buildings. In my view neither the split-level visible within the shops or obscuring of glazing will have an unacceptable visual impact.



Above, 280 Gray's Inn Road showing shop converted to residential use (approved 2010) and extensive horizontal and vertical internal divisions behind shopwindow



Above, 278 Gray's Inn Road showing showing shop converted to residential use (approved 2002) and extensive obscure glazing to shopwindow

Concern over loss of street front activity

Pre-application advice from Neil Quinn, London Borough of Camden, dated 17 March raised concerns over 'loss of street front activity'.

The existing building has been used for furniture storage and has not made a positive contribution to street front activity. Consequently the loss of street front activity is negligible. In any case this part of Gray's Inn Road has a varied character and unlike the southern end of Gray's Inn Road is not solely characterised by shops and is therefore less sensitive to appropriate change.

The provision of house as a public benefit

The provision of three two bedroom residential units in an area where this is an identified need for housing of this type is a substantial public benefit. Any concerns over the proposals should be weighed against the ability to deliver housing as a substantial public benefit.

Assessment of national and local policy and guidance

The main relevant national and local policies and guidance are detailed below.

National Policy

Planning (Listed Buildings and Conservation Areas) Act (1990)

The Planning (Listed Buildings and Conservation Areas) Act (1990) provides the primary legislation that is used to assess the impact of development proposals on conservation areas.

Sections 16 and 66 of the Act advises local planning authorities that when making a decision on all listed building consent applications or any decision on a planning application for development that affects a listed building or its setting, a local planning authority must 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 72 of the Act advises local planning authorities that in the exercise of their planning functions with respect to any building or land in a conservation area, 'special attention shall be paid to the desirability of preserving the character or appearance of that area'.

National Planning Policy Framework (2012)

The Government's national planning policies on the conservation of the historic environment are provided in Policy 12 *Conserving and enhancing the historic environment* of National Planning Policy Framework (NPPF) published in 2012.

The NPPF states:

128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
131. In determining planning applications, local planning authorities should take account of:
- 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.
132. 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, 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 form of 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.

- 134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 137. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 138. Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The Historic Environment Planning Practice Guide to PPS5 Planning for the Historic Environment

The Historic Environment Planning Practice Guide to PPS5 Planning for the Historic Environment is retained guidance and states the following with regards to new development in conservation areas:

The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, are proportion, height, massing, bulk, use of materials, use, relationship with adjacent assets, alignment and treatment of setting. Replicating a particular style may be less important, though there are circumstances when it may be appropriate. It would not normally be acceptable for new work to dominate the original asset or its setting in either scale, material or as a result of its siting. Assessment of an asset's significance and its relationship to its setting will usually suggest the forms of extension that might be appropriate. (Paragraph 178).

Local Policy

Core strategy policy CS14 – Promoting high quality places and conservation our heritage assets

Policy CS14 sets out the Council's overall strategy on promotion high quality places and buildings are attractive, safe, healthy and easy to use and requiring development to be of the highest standard of design that respects local context and character.

Development Policy DP24 – Securing high quality design

Policy DP24 contributes to implementing the Core Strategy by setting out Camden's detailed approach to the design of new developments and alterations and extensions.

Development Policy DP25 – Conserving Camden's heritage

Policy DP25 provides further guidance on the preservation and enhancement of the historic environment.

Conclusion

The main purpose of this report has been to assess the site's contribution to the conservation area and the setting of the listed buildings, assess the impact of the proposed building on the heritage assets and to consider whether the proposal complies with national and local policies relating the historic built environment.

In my view the poor quality late C20 building, with a metal framed shopfront, makes a neutral contribution to the conservation area at best - I would say that it makes a negative contribution and detracts from the setting of the listed buildings.

The proposal reinstates three high quality traditional timber shopfronts - likely to closely resemble the appearance of the Victorian shops that previously existed on the site in so far as their detailing includes all the features commonly found in Victorian shopfronts; a panelled stallriser, clerestory, fascia and pilasters.

It has been shown that the proposed building should not be considered 'overly tall' in the context of Victorian shopfronts in London or this specific site, that the reduction in visibility of the rear of the listed terrace on Mecklenburgh Street will be negligible and imperceptible by the average passerby, that the loss of street front activity is negligible and that visual impact of the split-level visible within the shops has been reduced as much as possible and will not have an unacceptable visual impact.

In my view the proposal will substantially enhance the character and appearance of this part of the conservation area and the setting of the listed buildings and this should be considered an important public / heritage benefit.

Paragraph 137 of the NPPF states that:

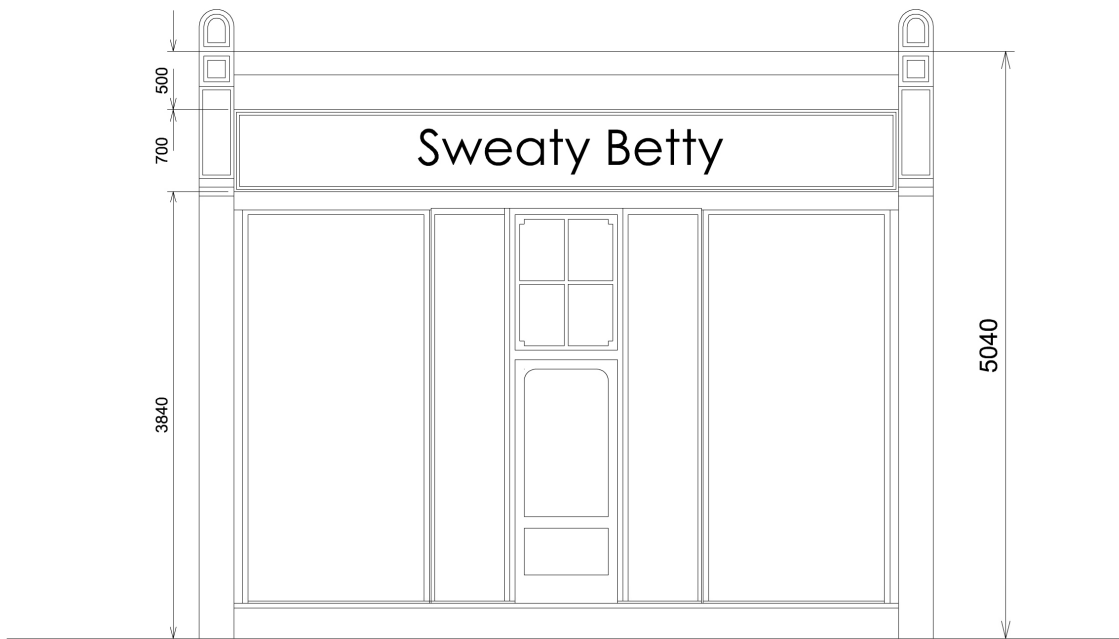
"Local planning authorities should look for opportunities for new development within Conservation Areas... and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably".

In my view this proposal represents such an opportunity envisaged by the NPPF and should be treated favourably. The provision of three two bedroom residential units in an area where this is an identified need for housing of this type is a substantial public benefit.

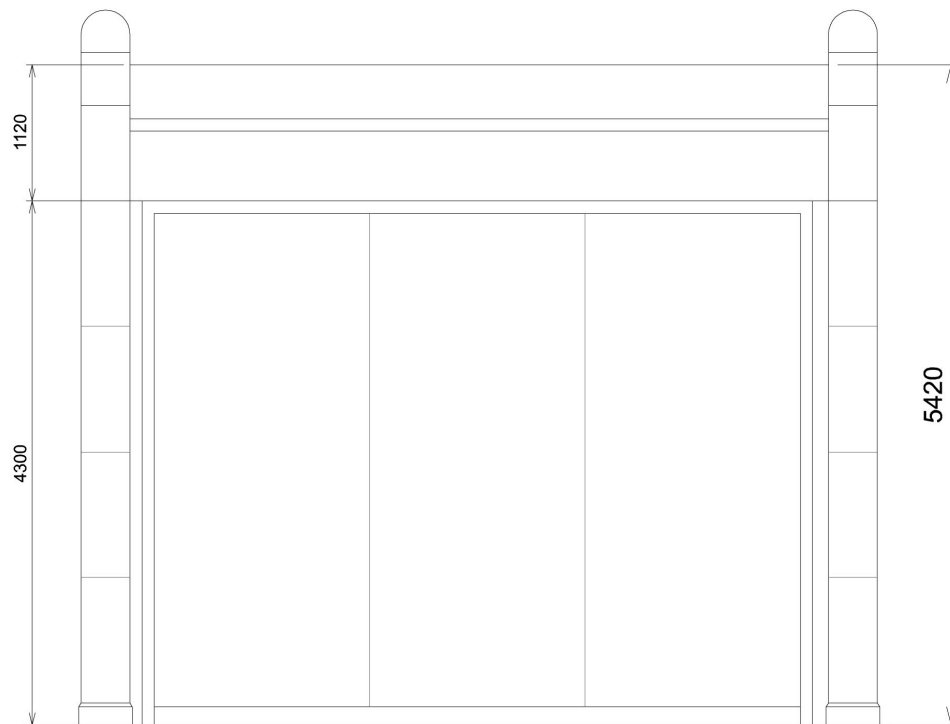
For these reasons the proposal complies with national and local policy and guidance regarding the historic built environment.

APPENDIX 1

133 Upper Street



290-292 Pentonville Road



Seven Sisters Road (corner of Yonge Park)

