

11-12 Grenville Street

London WC1N 1LZ

Heritage Appraisal

July 2017

Consultancy for the
Historic Built Environment

KMIHeritage

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1 Introduction

- 1.1 This report has been prepared by KMHeritage on the instruction of Calabar Properties Ltd in support of a planning application for the extension and refurbishment of 11-12 Grenville Street, London WC1N 1LZ.

Purpose

- 1.2 The purpose of the report is to assess the proposed development against national and local policies relating to the historic built environment.
- 1.3 This report should be read in conjunction with the Design and Access Statement and drawings prepared by Garnett & Partners.

Previous reports

- 1.4 In August 2016, KMHeritage prepared a Heritage Appraisal¹ in support of an application for planning permission (ref. 2016/4372/P) in respect of 11-12 Grenville Street. This application was refused on 11 January 2017. KMHeritage also prepared a report² in support of earlier applications in 2009 (refs. 2009/4992/P and 2009/4993/C), which were withdrawn. KMHeritage did not provide a report for the 2013 planning application (ref. 2013/0833/P), which was refused on 24 October 2013. The Design & Access Statement contains detailed information about the planning history of the site.

Organisation

- 1.5 This introduction is followed by a brief description of the buildings, and an outline in Section 4 of the proposed scheme. Section 5 sets out the national and local policy

¹ 11-12 Grenville Street London WC1N 1LZ: Heritage Appraisal, KMHeritage, August 2016

² 11-12 Grenville Street London WC1N 1LZ: Historic building appraisal and justification of proposals, KMHeritage, September 2009

and guidance relating to the historic built environment that is relevant to this matter. Section 6 describes the benefits of the scheme, and Section 7 assesses the proposed development against that policy and guidance. Appendices contain a location plan and photographs.

Author

- 1.6 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark, and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect, and has a specialist qualification in urban and building conservation. Kevin Murphy was included for a number of years on the Heritage Lottery Fund's Directory of Expert Advisers.
- 1.7 Historical and background research for this report was undertaken by Dr Ann Robey FSA, a conservation and heritage professional with over twenty years experience. She has worked for leading national bodies as well as smaller local organizations and charities. She is a researcher and writer specialising in architectural, social and economic history, with a publication record that includes books, articles, exhibitions and collaborative research.

2 The site and its context

The area

- 2.1 In the middle of the eighteenth century the area was largely in open fields beyond the Duke of Bedford's estate centered around Bloomsbury Square to the south. Between 1746 and 1752, Thomas Coram established his Foundling Hospital on a site to the east of where the Brunswick Centre now stands. The Hospital remained until 1926, when it was demolished, its grounds surviving as Coram's Fields. In 1790, S.P. Cockerell drew up a plan for the laying out of the Hospital's surrounding estate. Brunswick Square and Mecklenburgh Square were established to the east and west of Coram's Fields, and other streets were established around these spaces.
- 2.2 The area around Brunswick Square evolved from suburban periphery in the late 1700s (with, for instance, the building of the houses on the north side of Guilford Street by) through rapid development in the 19th century to the dense fabric shown on the Ordnance Survey maps from the late 1800s onwards.
- 2.3 James Burton is associated with the development of houses in the area, and, as architect/builder to the fifth Duke of Bedford, was also responsible for the laying out of Bedford Place, Montague Street and Russell Square. The area upon which the Brunswick Centre was built appears to have been one of fairly typical terraced Georgian houses, and there was a small mews lane between Kenton Street and Brunswick Square.
- 2.4 The area would have been typical of others in London such as the Portman Estate, developed rapidly in terraces of speculatively built houses for the middle classes. The area was heavily bombed during the Second World War, and areas to the north of Brunswick Square towards King's Cross were cleared for social housing in subsequent years.

The building

- 2.5 11-12 Grenville Street is a late 19th century combination of buildings. It appears to have taken its present form sometime after the 1830s, when Greenwood's map (see Appendix B for historical mapping) shows the eastern end of Colonnade without an arched entrance.
- 2.6 After the late 1870s, the continuous line of mews buildings to Bernard Street on Colonnade seems to have been cleared, and were only replaced in a piecemeal fashion after World War One. By the 1880s, the layout is as we now find it, though the coverage of the plot of No.11 has reduced by the mid-1890s, with the removal of a building or buildings from the rear part of the site.
- 2.7 In the mid-19th century layout of Colonnade, what seems to have been a frontage area or pavement to the mews buildings on the northern side of the lane set the building line for the side wall of what is now No. 11 Grenville Street. By the 1890s, the building expands to the outer edge of whatever this zone was, and suggests that both No. 11 and No. 12 were rebuilt around this time, with No. 12 finding ground level on the northern side of the arch, and the two houses were combined into what we have now. This is the impression given by the building today, in that the wider elevation of No 12 extends by one bay across the arch - the approximate width of the frontage/pavement shown on the 1780s mapping. The fenestration of the elevation to Grenville Street also suggests this alter date for the buildings – large openings and 1/1 panes are suggestive of the late-Victorian/Edwardian eras.

The surroundings of the site

- 2.8 Grenville Street consists almost entirely of buildings built during the 20th century. The buildings on the western side between No. 12 and Guilford Street were built in recent years in a style that imitates the general Georgian

character of other streets such as Bernard Street and Guilford Street.

- 2.9 The block bounded by Grenville Street, Brunswick Square, Lansdowne Terrace and Guilford Street has, with the exception of a small group of surviving and much-altered town houses at the corner of Lansdowne Terrace and Guilford Street, been entirely redeveloped. This commenced in the 1960s, and the most recent project – for Guilford Street – was completed a number of years ago, when the town houses were also refurbished.
- 2.10 The southern side of Guilford Street consists almost entirely of large institutional buildings erected after World War II, which combined multiple plots and built to a considerably greater height than the pre-existing Georgian terraces. At the junction with Queen Court, there is a thirteen-storey hospital building. To the north, the block bounded by Handel Street, Marchmont Street, Bernard Street and Brunswick Square was replaced with the Brunswick in the late 1960 and early 1970s.
- 2.11 Immediately to the north of No. 11 is Downing Court, an apartment building erected sometime between the two world wars.
- 2.12 While the scale of the eastern side is regular – six storeys – that of the western side varies from four to six.

The heritage context of 11-12 Grenville Street

- 2.13 11-12 Grenville Street is located in the south western corner of Sub-area 12 of the Bloomsbury Conservation Area, on its boundary with Sub-Area 11, which is dominated by Coram's Fields, Brunswick Square and the Brunswick Centre.
- 2.14 In the vicinity of 11-12 Grenville Street, Nos. 75-82 and 89-92 Guilford Street are listed Grade II, as is 11-28 Bernard Street and the Brunswick Centre to the north.
- 2.15 Within Colonnade, a pair of boundary markers at approximately Mo 23 are locally listed.

- 2.16 Coram's Fields, with Mecklenburgh and Brunswick Squares are included in the Register of Historic Parks and Gardens at Grade II.

Heritage significance

Assessing heritage significance: definitions

- 2.17 The listed buildings and the conservation area are 'designated heritage assets', as defined by the National Planning Policy Framework (NPPF). Unlisted Buildings of Merit are 'non-designated heritage assets'.
- 2.18 Heritage 'significance' is defined in the NPPF 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'. The Historic England 'Historic Environment Good Practice Advice in Planning Note 2' puts it slightly differently – as 'the sum of its architectural, historic, artistic or archaeological interest'.
- 2.19 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (English Heritage, 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.

The relevant heritage assets

- 2.20 In terms of the assessment of the proposals for 11-12 Grenville Street, the heritage assets most relevant to considering the effect of the scheme are the Bloomsbury Conservation Area. The effect of the proposed scheme will be on the character and appearance of the conservation area.
- 2.21 The physical and visual relationship of 11-12 Grenville Street to nearby listed buildings is such that no effect from the proposed scheme on their setting is anticipated. The site can only be very obliquely seen with the listed terrace on the northern side of Guilford Street (Grade II), and the same is true of the listed houses (Grade II) on Bernard

Street. Because the Brunswick Centre (Grade II) is set far back from the edge of Brunswick Square behind a line of trees, 11-12 Grenville Street will not be seen in the backdrop when looking south from Hunter Street.

The character and appearance of the conservation area

2.22 The Bloomsbury Conservation Area is extremely large, and contains a very great variety of urban form and street layout, as well as a multiplicity of building types, styles and age. Its character and appearance is very disparate, and this is reflected in the division of the area into fifteen sub-areas in the conservation area appraisal.

2.23 The conservation area appraisal says that ‘A range of building types is evident across the conservation area although the predominant building type is the townhouse in a terraced form ... The townhouses generally have basements and attic storeys’. It also says that ‘The townhouses arranged in terraces is the predominant form across the area, reflecting the speculative, (mainly) residential development of the Stuart, Georgian, Regency and early Victorian periods. This gives a distinctive, repeated grain to large parts of the area. It says of the town houses in the area that ‘The terraced townhouses have a number of characteristic details in their design including the repeated pattern of windows, reducing in height from the first floor upwards, signifying the reducing significance with properties generally being three windows across.

2.24 11-12 Grenville Street are identified as making a positive contribution to the character and appearance of the Conservation Area. The character and appearance of sub-area 12 in which 11-12 Grenville Street is found is described as follows in the conservation area appraisal:

‘This area is dominated by the large scale, historic open spaces in the vicinity of Coram’s Fields, resulting in a notable sense of openness which contrasts with surrounding areas. There is a predominance of institutional (hospital, university, education), recreational

and community uses with secondary residential and office uses. The area is relatively busy during the daytime as a result of these uses.'

2.25 It goes on to say:

'The remaining fragments of the townhouses developed on the Foundling and surrounding estates in the late 18th and early 19th century, are mostly listed. These contrast with the much larger scale footprints of the 20th century redevelopment such as the Brunswick Centre. The 20th Century developments tend to have large footprints occupying entire street blocks and contrasting with the much finer grain of earlier housing development. Whilst the Brunswick Centre has erased the pattern of earlier streets, elsewhere the street pattern and pattern of open space remains as laid out when the area developed'.

2.26 Of the built form in the sub-area, the conservation area appraisal says:

'The Georgian townhouses in the sub area form homogeneous terraces and tend to be listed. Some terraces have an overall classical composition giving them a greater sense of scale and presence; there is a fine example on the east side of Mecklenburgh Square. The overall height and articulation of the facades, visually supported by front boundary railings provide a sense of enclosure and overall unity in this area. Many of the Georgian townhouses were developed by James Burton. Features of note include their chimney pots (made at nearby Bagnigge Wells in Clerkenwell), frontage railings and basements, and decorative wrought-iron first-floor balconies'.

'Historic interest', 'Historical value' and 'Evidential value'

2.27 The listed and unlisted buildings in the vicinity of 11-12 Grenville Street, and their relationship to one another and the Bloomsbury Conservation Area collectively illustrate the development of this part of London. They tell us about the nature of the expansion of London from the mid 18th century onwards, how this affected the existing

semi-rural landscape around London, about how the housing built in the 18th and 19th centuries was adapted to suit occupation in later periods, and how the 20th century caused further urban and architectural change as a result of social and economic changes. 11-12 Grenville Street and its context also tells us about transformations in the urban fabric during the 20th century, and about the dynamics of post-WWII development. The area and its buildings area a record of social and economic change and lifestyles in various periods, and illustrate the effect these things had on the historic building stock and urban grain.

- 2.28 In terms of English Heritage's 'Conservation Principles' the 11-12 Grenville Street and the Bloomsbury Conservation Area provide us with 'evidence about past human activity' and, by means of their fabric, design and appearance, communicate information about its past. Subsequent alteration, demolition and redevelopment in the area has not entirely removed the ability of the older townscape and intact historic buildings to do this; the Bloomsbury Conservation Area and its buildings clearly retains sufficient historic character and appearance to convey the area's historical ethos. Despite changes, the significant buildings - whether statutorily listed or unlisted buildings of merit - retain their ability to convey this historical value.

'Architectural interest', 'artistic interest' or 'aesthetic value'

- 2.29 It is clear that the conservation areas, the listed buildings and the unlisted buildings of merit referred to above have - in varying degrees - 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'.
- 2.30 The part of the Bloomsbury Conservation Area in the vicinity of 11-12 Grenville Street possesses these heritage

values to a considerable degree. The contributing elements of the aesthetic significance of the area as a piece of historic townscape are the nature of older (listed and unlisted) structures and their contribution to the historic streetscape, and that streetscape itself.

- 2.31 The contribution of 11-12 Grenville Street to the Bloomsbury Conservation Area is principally provided by the parts of the houses facing the street, and only by its rear parts to a secondary degree. The rear parts of 11-12 Grenville Street are altogether more prosaic and utilitarian - they are plainer and made of lesser materials, and the rear of the building has considerably less by way of architectural interest than the front.

Heritage significance: summary

- 2.32 In architectural terms, 11-12 Grenville Street is unremarkable, and have been heavily altered internally. Though appearing as two buildings, the property is essentially one building internally, with only the stepped façade and multiple changes of level internally to indicate that there may have been two houses. The plan involves a stairs placed at right angles in No. 11, giving access to a hallway facing the lane on each of the upper storeys. There is one room behind the stairs and one room in front. A stepped corridor runs across the back of the part of 'No.12' over the arch, giving access to two (second floor) or three (first and third floors) rooms facing Grenville Street. A small room is located in the sliver of building rising on the southern side of the arch.
- 2.33 Externally, the ground floor of the buildings was clearly altered at some point during the 20th century, given the style of the treatment and the lettering that says 'Colonnade' over the archway. This probably corresponds with the redevelopment of the lane after WWI.
- 2.34 The only noticeable - as opposed to notable - architectural element of the building that has any relevance to its surroundings is the fenestration pattern on the Grenville Street, and very little can be said about it. Compared to

the elegant proportions and hierarchical arrangement of openings in Burton's houses on Guilford Street, 11-12 Grenville Street is clumsy: No. 12 is awkwardly square in shape above the ground floor, No. 11 is awkwardly narrow. Both float incongruously above the rather grim and minimal later ground floor. If there was a basement area (suggested by the railings) to No. 11, it has been filled in.

3 The proposed development

Introduction

- 3.1 The proposed scheme for 11-12 Grenville Street is illustrated in the design drawings of Garnett & Partners, and described in the accompanying Design & Access Statement.

Previous proposals

- 3.2 In 2009 planning permission (application ref. 2009/4992/P) was sought for a proposal to demolish the existing buildings and erect a five storey residential development. The application was withdrawn. In October 2013 a planning application (ref 2013/0833/P) was refused for the conversion of the existing buildings to residential use including the erection of a rear extension and new mansard extension at roof level. The application was refused for a number of reasons including including land use, design and massing. Finally, a further application for planning permission (ref. 2016/4372/P) was refused on 11 January 2016. The Design & Access Statement contains detailed information about the planning history of the site.

The purpose of the proposed scheme

- 3.3 The building is in poor condition and has been vacant for a considerable period. The das describes the problems of the existing building as it is now found. There are two straightforwardly practical reasons that support a major intervention in the building now. A structural engineer's report has identified problems that mitigate against its practical and efficient use, and a separate assessment of the commercial viability of the property indicates that it is essentially unlettable for, say, office purposes in its current form. The upper floors have been vacant for over 15 years and repeatedly subject to vandalism by squatters.

- 3.4 For these reason, a scheme that refurbishes, repairs and extends the property is required in order to ensure that
- The positive contribution that 11-12 Grenville Street makes to the Bloomsbury Conservation Area is sustained over the long term; and
 - 11-12 Grenville Street is permitted to play its role in the economic well-being of Bloomsbury, Camden and London.
- 3.5 The Design & Access Statement describes how the various reasons for the refusal of planning permission and pre-application advice provided by the Council have been addressed in the present proposals.

The proposed scheme

- 3.6 The proposal will restore and enhance the existing buildings while sensitively extending them at the rear and roof level to provide additional accommodation. The upper floors will be converted from office to residential use, to provide three 2-bed units and three 1-bed apartments. The existing A3 unit at ground floor will be retained, refurbished and extended, and combining the A1 use from the kiosk with the existing café to make a flexible A1/A3 unit. A new traditionally designed shop front will be provided. The Grenville Street elevation will be cleaned and restored with new sashes to the windows, structural repairs and the refurbishment of the entrance to Colonnade.
- 3.7 The existing garage building to the rear of 11 Grenville Street will be converted to provide a mews style self-contained house. The design has been amended since the previous application to address the Council's concerns. The entrance to the upper floors of the development will be through the existing doorway of No. 11 and to the 2-bedroom maisonette (ground to second floors) through the doorway of No. 12, to the left of Colonnade.

- 3.8 There will be a new mansard roof extension, confined to the northern portion of the roof above No. 11 Grenville Street, between the tall party wall of Downing Court and the chimney stack to the south. Whereas previously a mansard was proposed across the full plan extent of the roof, the present proposal confines the mansard to the part of the roof closest to the much taller building to the north. The remainder of the roof will be replaced using traditional materials. The new mansard will also be traditionally detailed. The effect of the roof proposals is modest and proportionate, and there will be a minimal but positive effect on the character and appearance of the conservation area.
- 3.9 The rear elevation will be rebuilt to create a modest amount of addition plan area, which, in turn, will permit adequately sized apartments with efficient layouts. The Council previously considered this proposal acceptable.

Effect on heritage significance

- 3.10 The proposed scheme will preserve and enhance the character and appearance of the Bloomsbury Conservation Area. It will result in the refurbishment and repair of a long-vacant building in poor condition, bringing it back into active and ongoing use, and thus enlivening Grenville Street and this part of the conservation area.
- 3.11 The proposed mansard roof – a reduction in extent from the previous applications - will create a satisfying visual transition between the taller Downing Court to the north and the lower properties to the south. It will be correctly detailed and constructed, and is an entirely suitable and familiar feature of a building such as 11-12 Grenville Street - very many buildings across London such as 11-12 Grenville Street possess mansard roofs, and the proposal would be fitting and in keeping. The mansard is confined to a roof zone defined by the party wall with Downing Court and the chimney stack to the south.

- 3.12 There is no specific unity or composition in the buildings that form the western side of Grenville Street, nor are they linked as a group to those on Guilford Street. For instance, No 16 Grenville Street is a storey lower than the other building on that side of the street. Nos. 13-15 are a modern pastiche of Georgian architecture with a flat roof. There is no valid reason why 11-12 Grenville Street cannot have an added storey, particularly as Downing Court is taller and particularly as the proposed additional level is a mansard. However, the present scheme proposes an even more gradual stepping down than previously proposed.
- 3.13 The increase in the depth of the plan nonetheless preserves the stepped line of the rear façade, and leaves one bay of the return along Colonnade - the proposal would cover just one bay of the existing return. The rear elevation would be traditionally detailed and constructed, and, as with the proposed mansard, appear entirely appropriate and intended. The quality and informal character of the rear parts of 11-12 Grenville Street will be preserved in the proposal, which will reproduce that quality and character in appearance, materials and detailing.
- 3.14 The new mews house replaces a poor quality garage with a new dwelling that is made of traditional materials and is designed to respect its context. It will be traditional in appearance. It echoes the variety and slightly greater informality of Colonnade while maintaining a suitably subservient and modest demeanor in relation to the street and to 11-12 Grenville Street.

Conclusion

- 3.15 For the reasons given above, we conclude that the proposed scheme for 11-12 Grenville Street will enhance the local significance of the property as a positive contributor to the Bloomsbury Conservation Area and the overall character and appearance of the Bloomsbury Conservation Area. There will be no meaningful effect on the setting of listed buildings.

4 The legislative and policy context

Introduction

- 4.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.
- 4.2 Section 5 demonstrates how the proposed development complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 5: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surrounding, and in reaching conclusions about the effect of the proposed development.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers to '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' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.
- 4.4 Appendix D sets out our understanding of the process by which sections 66(1) and section 72(1) of the Act are applied by decision makers in conjunction with the National Planning Policy Framework.

The National Planning Policy Framework

- 4.5 Paragraph 56 of the NPPF says that 'the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable

development, is indivisible from good planning, and should contribute positively to making places better for people’.

4.6 Paragraph 60 says:

Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

4.7 Paragraph 61 continues:

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

4.8 Paragraph 63 says that ‘In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area’.

4.9 The NPPF says at Paragraph 128 that:

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.

4.10 A description and analysis of the heritage significance of 11-12 Grenville Street and its context is provided earlier in this report.

4.11 The NPPF also requires local planning authorities to ‘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'.

4.12 At Paragraph 131, the NPPF says that:

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.*

4.13 Paragraph 132 advises local planning authorities 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. 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'.

4.14 The NPPF says at Paragraph 133 'Good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development. Good design is indivisible from good planning.' Paragraph 133 says:

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.*

- 4.15 Paragraph 134 says that ‘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.
- 4.16 Further advice within Section 12 of the NPPF urges local planning authorities to take into account the effect of an application on the significance of a non-designated heritage asset when determining the application. It says that ‘In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.
- 4.17 Paragraph 137 of the NPPF advises local planning authorities to ‘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’.
- 4.18 Paragraph 138 says that:

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.

Planning Practice Guidance

4.19 In 2014 the government published new streamlined planning practice guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled 'Conserving and Enhancing the Historic Environment'. It is subdivided into sections giving specific advice in the following areas:

- Historic Environment Policy and Legislation
- Heritage in Local Plans
- Decision-taking: Historic Environment
- Designated Heritage Assets
- Non-Designated Assets
- Heritage Consent Processes and
- Consultation Requirements

Historic England's Good Practice Advice in Planning Notes

4.20 The NPPF incorporates many of the essential concepts in Planning Policy Statement 5 'Planning for the Historic Environment'. PPS5 was accompanied by a 'Planning for the Historic Environment Practice Guide', published by English Heritage 'to help practitioners implement the

policy, including the legislative requirements that underpin it'. In the light of the introduction of the NPPF, Good Practice Advice notes 1, 2 and 3 supersede the PPS 5 Practice Guide, which was been withdrawn on 27 March 2015. These notes are:

- Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans
- Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets

The London Plan

- 4.21 The London Plan 2016 (consolidated with alterations since 2011) is the current the spatial development strategy for London. This document, published in March 2015, is consolidated with all the alterations to the London Plan since 2011. The previous London Plan was published on 22 July 2011. It contains various policies relating to architecture, urban design and the historic built environment.
- 4.22 Policy 7.4 deals with 'Local character', and says that a development should allow 'buildings and structures that make a positive contribution to the character of a place, to influence the future character of the area' and be 'informed by the surrounding historic environment'.
- 4.23 Policy 7.8 deals with 'Heritage assets and archaeology', and says:
- A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the*

desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

4.24 Policy 7.9 deals with 'Heritage-led regeneration', and says:

A Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.

B The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

Camden Council's Local Development Framework

- 4.25 Camden Council adopted its Core Strategy and Development Policies on 8 November 2010. Core Strategy Policy CS14 deals with 'Promoting high quality places and conserving our heritage' and says:
- 'The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:*
- a) requiring development of the highest standard of design that respects local context and character;*
 - b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;*
 - c) promoting high quality landscaping and works to streets and public spaces;*
 - d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;*
 - e) protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views'.*
- 4.26 The commentary to the policy says:
- 'Our overall strategy is to sustainably manage growth in Camden so it meets our needs for homes, jobs and services in a way that conserves and enhances the features that make the borough such an attractive place to live, work and visit. Policy CS14 plays a key part in achieving this by setting out our approach to conserving and, where possible, enhancing our heritage and valued places, and to ensuring that development is of the highest standard and reflects, and where possible improves, its local area'*
- 4.27 It goes on to say
- 'Development schemes should improve the quality of buildings, landscaping and the street environment and,*

through this, improve the experience of the borough for residents and visitors'

4.28 Regarding Camden's heritage, the Core Strategy refers to Policy DP25 in Camden Development Policies as providing more detailed guidance on the Council's approach to protecting and enriching the range of features that make up the built heritage of the borough.

4.29 Policy DP25 is as follows:

Conservation areas

In order to maintain the character of Camden's conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;*
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;*
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;*
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and*
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.*

Listed buildings

To preserve or enhance the borough's listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;*

f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and

g) not permit development that it considers would cause harm to the setting of a listed building.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets

The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

5 Compliance with legislation, policy and guidance

- 5.1 This report has provided a detailed description and analysis of the significance of 11-12 Grenville Street and its heritage context, as required by Paragraph 128 of the National Planning Policy Framework. In addition, the report also describes (in Section 4 ‘the proposed development and its effect’) how the proposed scheme will affect that heritage significance. The effect is positive, and for that reason, the scheme complies with policy and guidance. This section should be read with Section 4.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed scheme affecting 11-12 Grenville Street preserves and enhances the character and appearance of the Bloomsbury Conservation Area, as well as preserving and enhancing the setting of nearby listed buildings (i.e. the *designated* heritage assets that are the subject of the Act). The proposed development thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It does not lead to ‘substantial’ harm or any meaningful level of ‘less than substantial’ harm to any heritage assets.
- 5.3 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573, and is met if the proposed development leaves the conservation area unharmed.
- 5.4 In considering the proposed scheme for 11-12 Grenville Street it is worth noting Historic England’s online guidance regarding ‘Legal Requirements for Listed

Building and Other Consents'³. English Heritage points out that 'Most of the principles that should be adhered to when making planning and other consent decisions affecting the historic environment are set out in policy and guidance. However, the law introduces some important and inescapable considerations for certain applications'.

5.5 Historic England continues:

When considering any conservation area consent or planning permission decision that affects a conservation area a local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of that area....

The House of Lords in the South Lakeland case⁴ decided that the "statutorily desirable object of preserving the character or appearance of an area is achieved either by a positive contribution to preservation or by development which leaves character or appearance unharmed, that is to say preserved."

A development that merely maintains the status quo, perhaps by replacing a building that detracts from the character and appearance of the conservation area with a similarly detrimental building, would satisfy the statutory consideration. This is notwithstanding that the existing detrimental building presents an opportunity, when it is being redeveloped, to improve the environment.

However, in a number of ways the policies in the NPPF seek positive improvement in conservation areas. Most explicitly paragraphs 126 and 131 require that local planning authorities should take into account "the desirability of new development making a positive contribution to local character and distinctiveness". Paragraph 9 says that pursuing "sustainable development involves seeking positive improvements in the quality of the...historic environment...". The design policies further

³ <http://historicengland.org.uk/advice/hpg/decisionmaking/legalrequirements/>

⁴ *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573

reinforce the objective of enhancement of an area's character and local distinctiveness, concluding that "Permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area..." (paragraph 64).

Compliance with both the statutory consideration and the NPPF policies therefore, generally speaking, requires account to be taken of the desirability of taking opportunities to enhance the character and appearance of a conservation area. As such, whilst the South Lakeland case is still relevant to the interpretation of statute, its effect on decision-making has apparently been negated in this respect by the policies in the NPPF.

- 5.6 The key word in the final paragraph of this extract is 'apparently'. This carefully chosen word makes it abundantly clear that it is far from certain that the South Lakeland decision has been definitively altered by the National Planning Policy Framework. One reason is that it, as a legal decision, cannot be altered without a similar decision or legislation that overturns it – policy, even national planning policy guidance, cannot overturn legal decisions such as South Lakeland. Planning decisions are ultimately made in a legal and policy context – not just in a policy context alone.
- 5.7 The conclusion is this: it would be extremely difficult to portray the proposed scheme for 11-12 Grenville Street as doing anything less than maintaining the 'status quo' in the Bloomsbury Conservation Area, given the level of heritage significance found at the property and the evident quality that is present in the proposal.

The level of 'harm' caused by the proposed scheme

- 5.8 As outlined in Section 4, the NPPF identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm...or total loss of significance' or 'less than substantial'. Both levels of harm must be caused to a *designated* heritage asset – in this

instance the setting of listed buildings or the Bloomsbury Conservation Area.

- 5.9 The proposed scheme does not lead to ‘substantial’ harm or any meaningful level of ‘less than substantial’ harm to designated heritage assets. As has been explained earlier, the proposal very evidently does *not* result in the ‘total loss of significance’ of any listed building or the conservation area.
- 5.10 The only potential for ‘less than substantial’ harm would be if the proposed scheme for 11-12 Grenville Street caused the loss of a significant component of the special interest of the Bloomsbury Conservation Area or nearby listed buildings. There is nothing about the proposal that would give rise to this level of harm.

The balance of ‘harm’ versus benefit

- 5.11 In any event, the scheme provides a tangible public and heritage benefit by helping to sustain a positive contributor in the conservation area in its original use as a single dwelling - in reinforcing the residential character and appearance of this part of the conservation area by helping to update the property for modern domestic use and thus secure its long term future. This more than outweighs what low level of ‘harm’ - if any - that might be asserted regarding the scheme. The core special architectural and historic interest of the conservation area and nearby listed buildings is preserved as a result of the proposed scheme.
- 5.12 The economic benefits of the proposed scheme are clear: the proposed residential units would be attractive and bring more people to live in Grenville Street. Proximity to the Brunswick Centre and Lamb’s Conduit Street, and to Russell Square Underground Station, would give the building easy access to local businesses and to public transport.

The National Planning Policy Framework

- 5.13 In respect of Paragraph 131 of the NPPF, the proposed scheme can certainly be described as ‘sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’. It helps to sustain, by virtue of the quality of the scheme design, the ‘positive contribution’ that 11-12 Grenville Street can make to the Bloomsbury Conservation Area, and it preserves the special architectural and historic interest of the conservation area.
- 5.14 The proposed scheme complies with Paragraph 133 of the NPPF - it certainly does not lead to ‘substantial harm to or total loss of significance of a designated heritage asset’. It also complies with Paragraph 134 for the reasons given in detail earlier in this report – the scheme cannot be considered to harm the conservation area or listed buildings, but rather alters its site in a fashion that has a relatively small effect on overall heritage significance. Any ‘less than substantial harm to the significance of a designated heritage asset’ (Paragraph 134) - if any - that can be ascribed to the scheme is outweighed by the explicit heritage benefit of a scheme that demonstrably preserves the conservation area, and the setting of listed and locally listed buildings.
- 5.15 It is our view that the proposed scheme cannot reasonably be considered to cause harm to heritage assets when considered against the existing situation. The scheme very definitely strikes the balance suggested by Paragraph 134 of the NPPF – it intervenes in the Bloomsbury Conservation Area in a manner commensurate to its significance and to that of nearby listed buildings. This balance of intervention versus significance is described earlier and in the Design & Access Statement.

The London Plan

- 5.16 The proposed scheme for 11-12 Grenville Street is exactly what the London Plan envisages when it talks (in Policy 7.4) about developments having ‘regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings’. The design of the proposed scheme is inherently responsive to these features, and it is designed to respect the context in which it finds itself. The proposed scheme is of ‘the highest architectural quality’ and includes ‘details and materials that complement... the local architectural character’. The scheme thus complies with Policies 7.4 and 7.6. The proposed scheme adds life and vitality to the setting of heritage assets around it - the ‘desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping’ has been taken into account. The scheme clearly ‘conserve[s the significance of heritage assets], by being sympathetic to their form, scale, materials and architectural detail’. For these reasons, the scheme is consistent with Policy 7.8 of the London Plan.
- 5.17 It is also consistent with Policy 7.9 of the Plan – the ‘significance’ of the heritage assets in its context has been ‘assessed’ and the scheme is ‘designed so that the heritage significance is recognised both in [its] own right and as [a] catalyst for regeneration’.

Camden’s Local Development Framework

- 5.18 As has been shown, and for the same reasons that are given in respect of the NPPF and the London Plan, the scheme would provide new buildings that would make a positive contribution to the surrounding townscape and also preserve *and enhance* the character and appearance of the conservation area and the setting of listed structures.
- 5.19 For these reasons, and those given earlier, the proposed development is consistent with Camden’s Local

Development Framework policies regarding development in conservation areas, and in particular Policy DP25. It also preserves the setting of nearby listed buildings, and thus also complies with Policy DP25 in this respect.

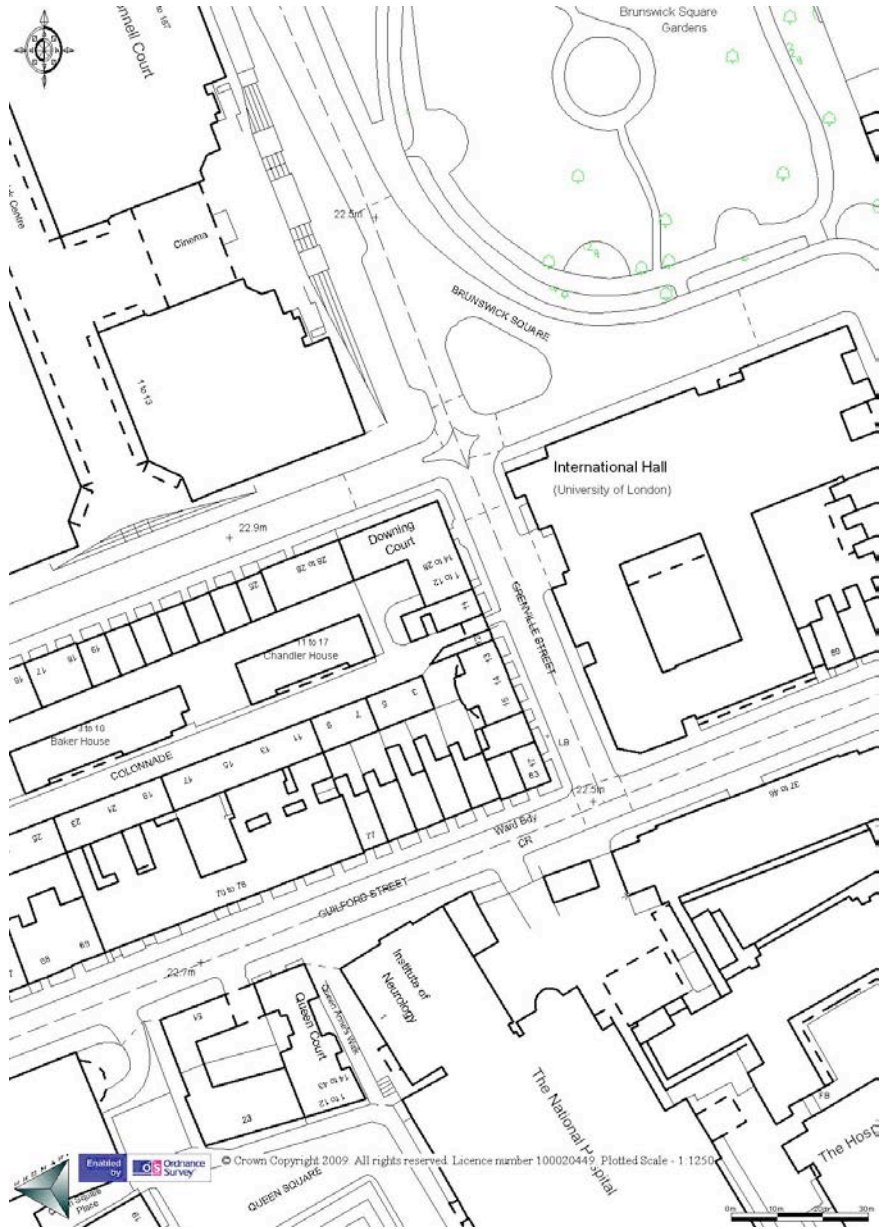
6 Conclusion

- 6.1 11-12 Grenville Street is located in Sub-area 12 of the Bloomsbury Conservation Area, on its boundary with Sub-Area 11. The terraces at 75-82 Guilford Street and 11-28 Bernard Street are listed Grade II, as is the Brunswick Centre. Coram's Fields, with Mecklenburgh and Brunswick Squares are included in the Register of Historic Parks and Gardens at Grade II.
- 6.2 11-12 Grenville Street is a late 19th century combination of buildings. It appears to have taken its present form sometime after the 1830s, when Greenwood's map shows the eastern end of Colonnade without an arched entrance. After the late 1870s, the continuous line of mews buildings to Bernard Street on Colonnade seems to have been cleared, and were only replaced in a piecemeal fashion after World War One. By the 1880s, the layout is as we now find it, though the coverage of the plot of No.11 has reduced by the mid-1890s, with the removal of a building or buildings from the rear part of the site.
- 6.3 In architectural terms, 11-12 Grenville Street is unremarkable, and has been heavily altered internally. Though appearing as two buildings, the property is essentially one building internally, with only the stepped façade and multiple changes of level internally to indicate that there may have been two houses.
- 6.4 The proposed scheme makes extensions and alterations to the buildings in order to accommodate a quantum of accommodation that will ensure the success of a redevelopment scheme over the long term. The proposed scheme will at the very least preserve the local significance of 11-12 Grenville Street and the character and appearance of the Bloomsbury Conservation Area. In our view, the scheme goes beyond this - it will enhance 11-12 Grenville Street and the conservation area with a high quality refurbishment and extension scheme that will

help sustain the positive contributor in its optimum viable use over the long term.

- 6.5 The present scheme has responded to comments and advice made by the Council concerning previous proposals for the site. Notably, a full mansard extending across the property is not now proposed, but rather confined to the roof space above No. 11 Grenville Street, immediately adjacent to the tall party wall of Downing Court and bounded to the south by a large chimney stack. The remainder of the roof will be replaced using traditional materials. The effect of the proposed alterations at roof level is modest and proportionate, and there will be a minimal but positive effect on the character and appearance of the conservation area. Elsewhere in the design of the scheme, such as in respect of the mews house, revisions have been made to the previous design to respond to the Council's comments.
- 6.6 For these reasons, discussed at greater length in the report, the proposed scheme will comply with the law, and national and local policies and guidance for urban design and the historic built environment.

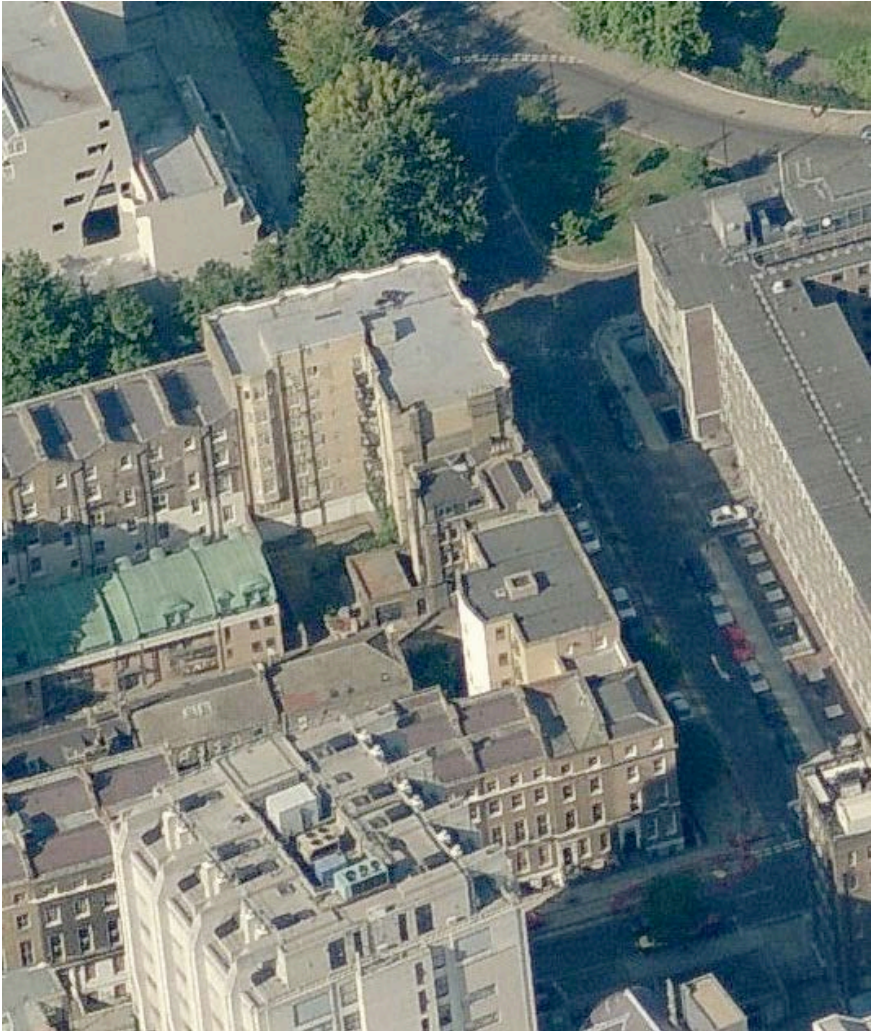
Appendix A: Location



Current Ordnance Survey



Aerial photograph



Oblique aerial view from the south



Oblique aerial view from the east

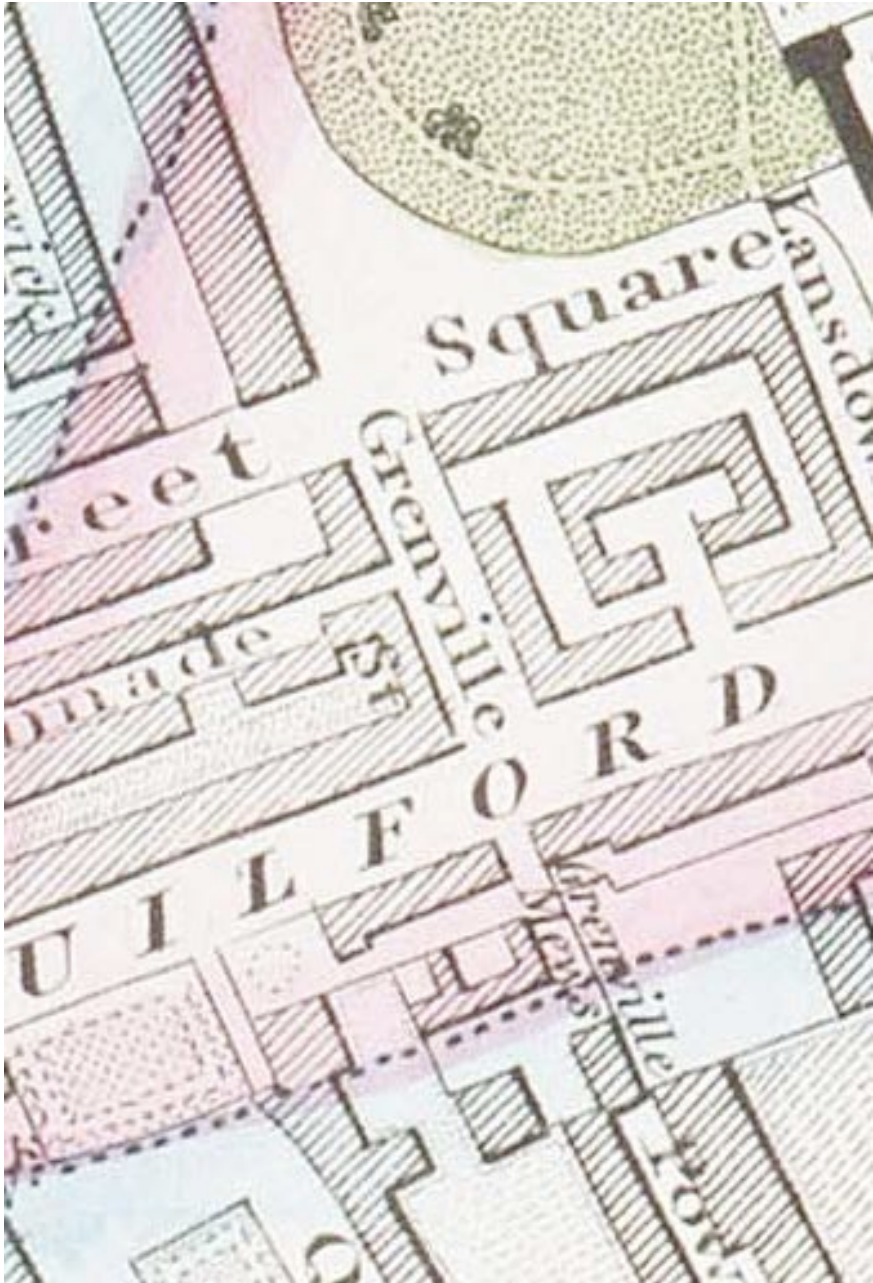


Oblique aerial view from the north



Oblique aerial view from the west

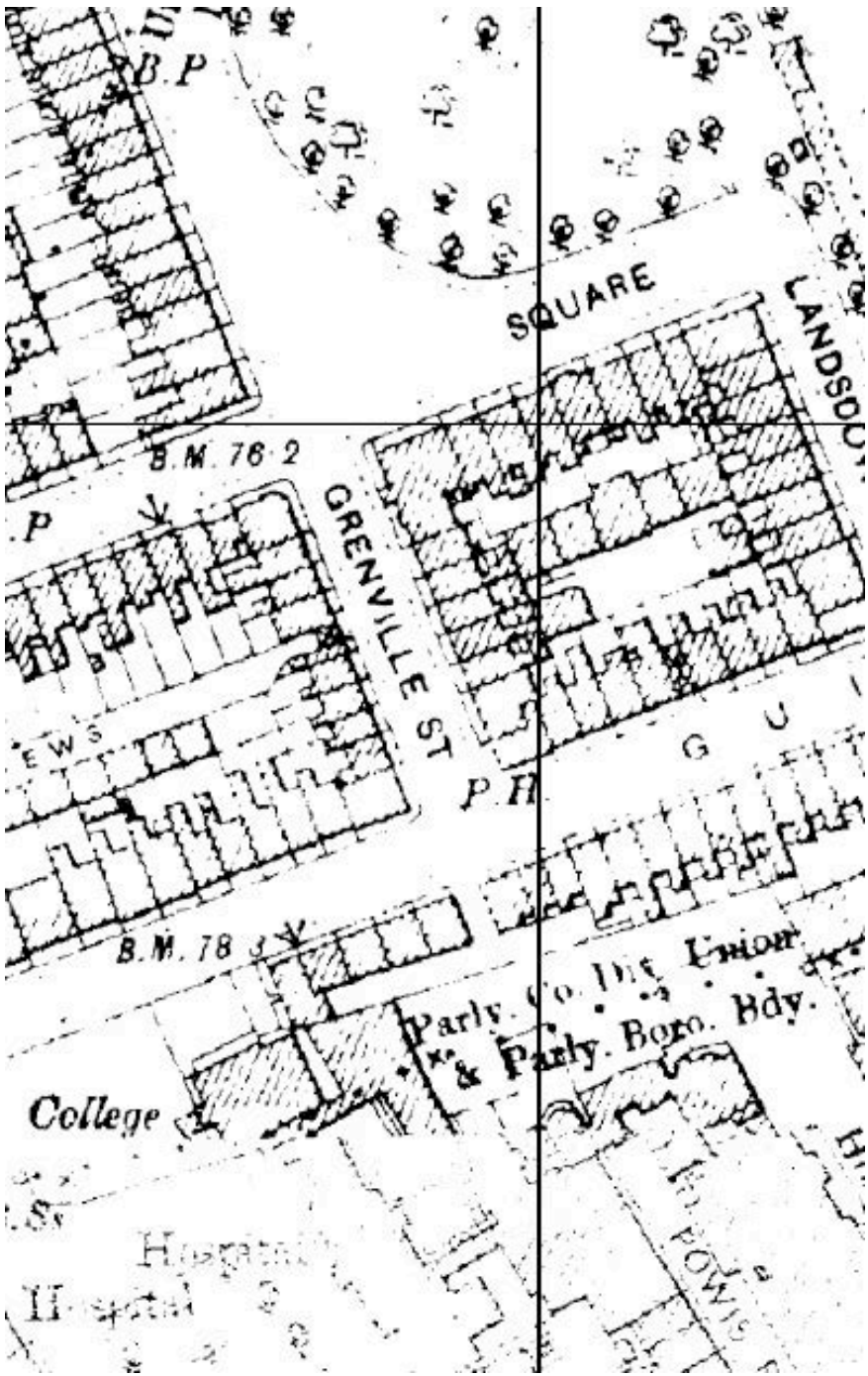
Appendix B: Historic maps



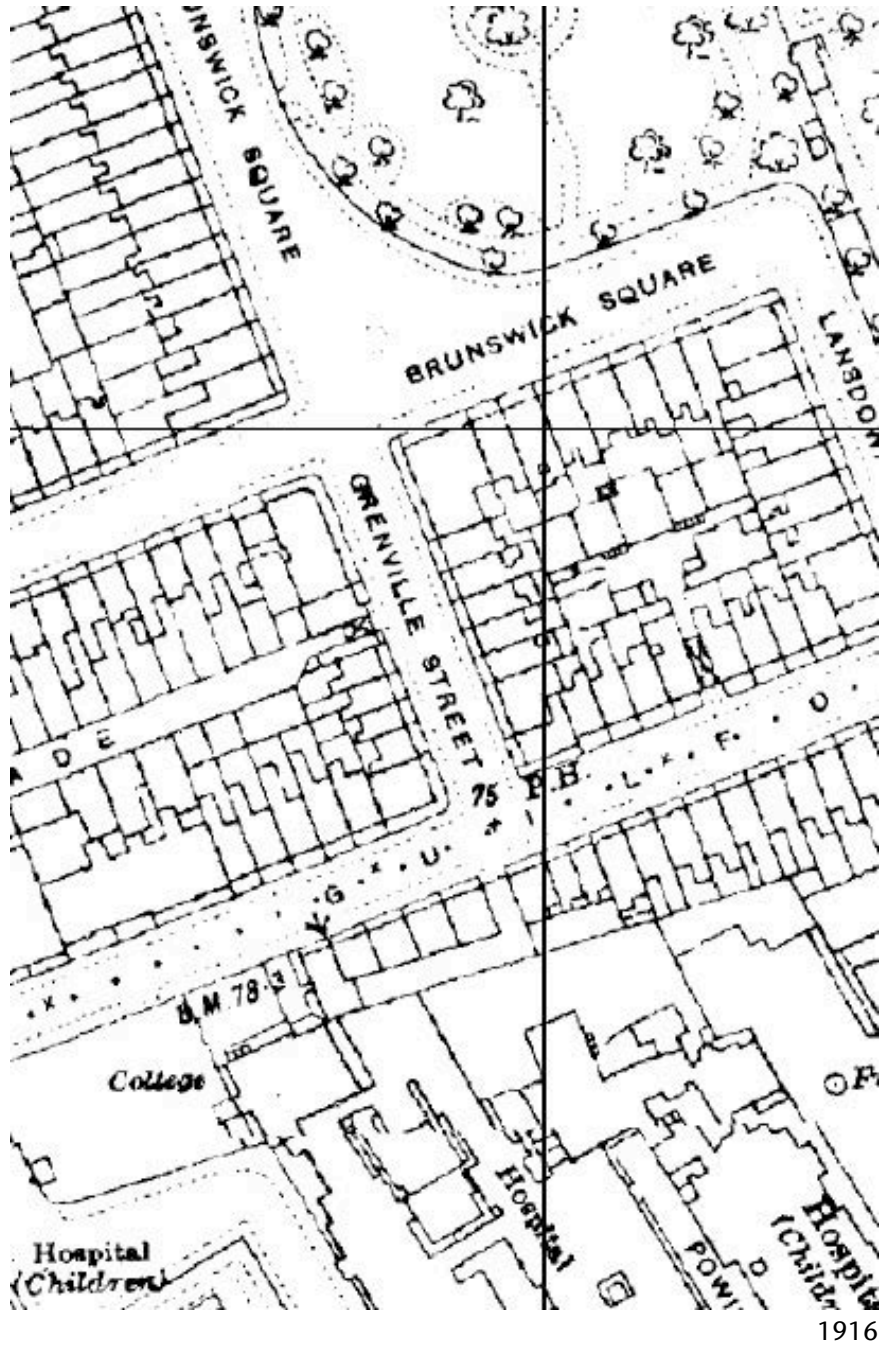
Greenwood, 1830

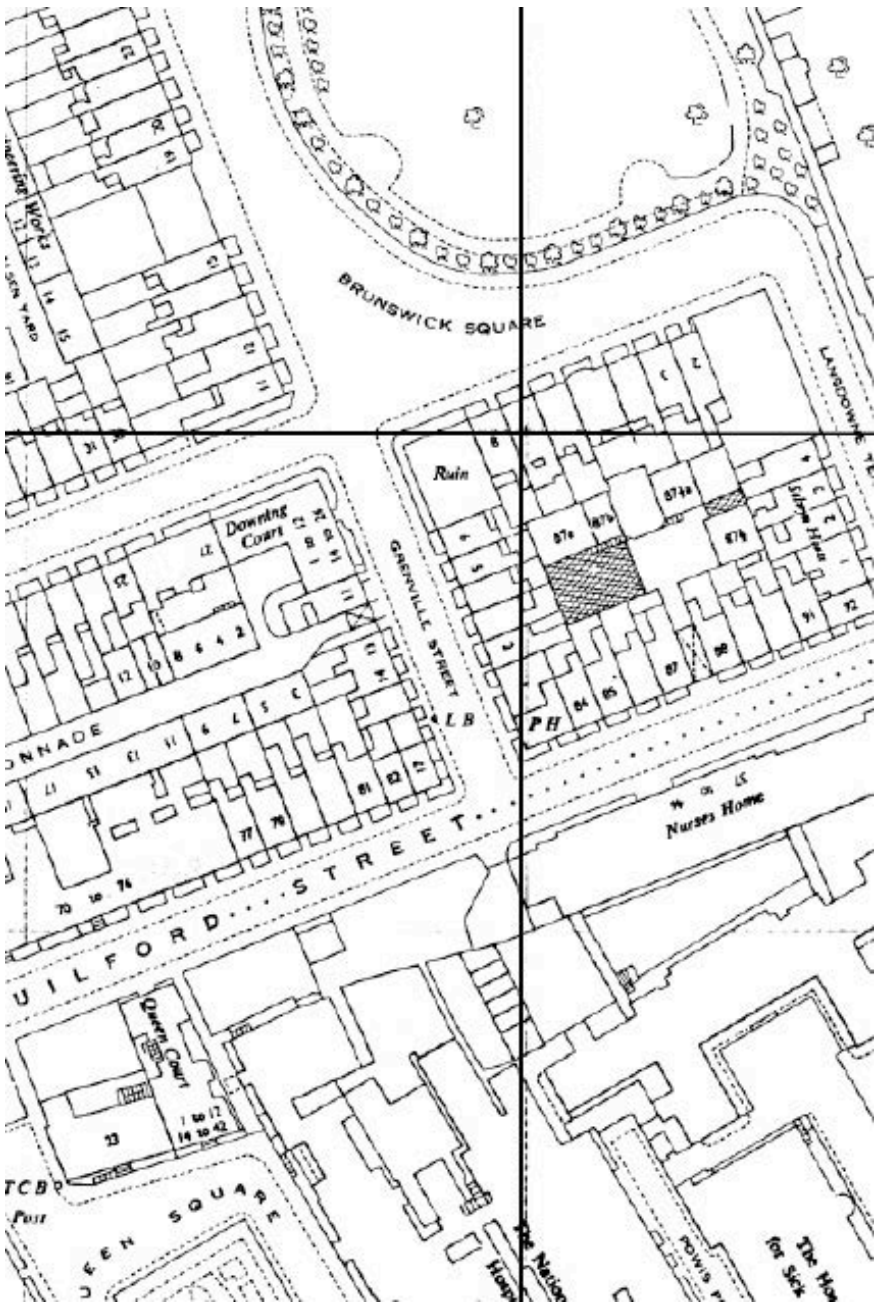


1875-78

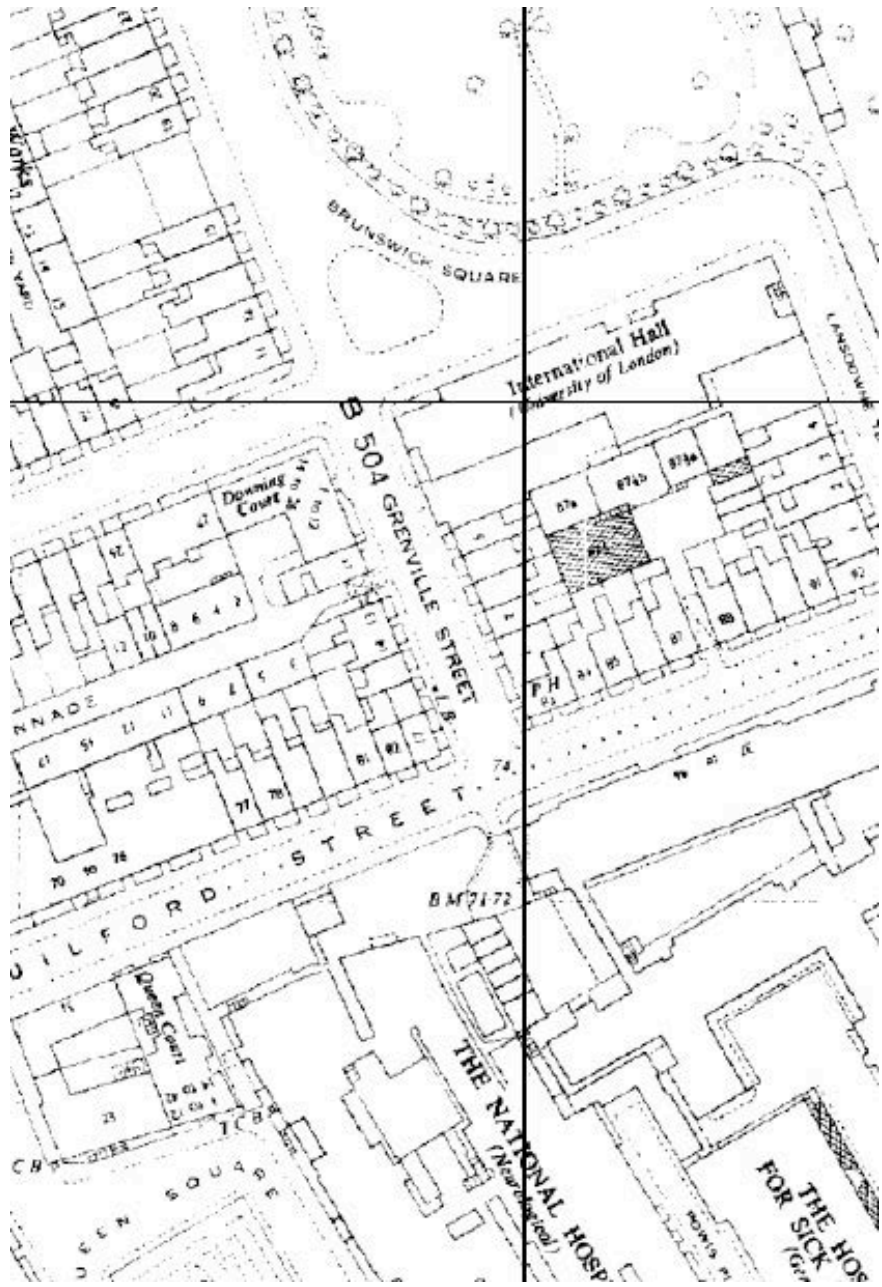


1896





1952-53



1965-70

Appendix C: Photographs









Appendix D: Approach to the statutory tests in sections 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990

We set out as follows the approach that we take to section 66(1) and section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 in the light of the *Barnwell Manor* Court of Appeal judgment and subsequent decision in the High Court in *Forge Field*.

Section 66(1) of the Act requires decision makers to "have special regard^[11] to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" when determining applications which affect a listed building or its setting.

Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay "*special attention*^[2] [...] to the desirability of preserving or enhancing the character or appearance of that area".

The necessary stages for the decision maker in fulfilling its duties under these sections (and therefore the approach to be taken in any analysis) are as follows:

Identify whether any harm is likely to be caused to a listed building or its setting or to a conservation area or its character or appearance and, if so, the likely nature of that harm. The assessment of as to whether there is likely to be harm is a matter for the decision-maker's own judgment. The decision-maker can still rationally conclude that there is no harm where any adverse implications for the listed building or conservation area are de minimis, considering the overall impact of the proposal on the heritage asset as a whole.

Identify all other material planning considerations, including national and local policies (compliance with the statutory development plan to be given particular weight because of the presumption in section 38(6) of the Planning and Compulsory Purchase Act 2004 that determination must be in accordance with the plan unless material considerations indicate otherwise).

If there is likely to be harm (whether substantial or not), the decision-maker must balance that harm against any countervailing planning benefits, but in so doing must give “considerable importance and weight” to the finding of harm. Another way to describe giving “considerable importance and weight” to the finding of harm is to say (as the court did in *Forge Field*) that there is a “strong presumption ... against granting planning permission for any development which would fail to preserve the setting of a listed building or the character or appearance of a conservation area”, which presumption “can be outweighed by material considerations powerful enough to do so”.

Where “substantial harm” is found, the advice in paragraph 133 of the NPPF should additionally be taken into account, namely that consent should be refused “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 at least one of four specified criteria are met.

Where there is found to be harm which is less than substantial, care is needed that the decision-maker expresses and applies the test correctly. Paragraph 134 of the NPPF states: ““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.” However, this now needs to be applied in the light of *Barnwell Manor* and *Forge Field*. As set out above, even where “a development proposal will lead to less than substantial harm to the significance of a designated heritage asset”, in weighing that harm “against the public benefits of the proposal, including securing its optimum viable use”, it is clear that “considerable importance and weight” should be given to that finding of harm.

If both section 66 (any listed building and/or its setting) and section 72 (any conservation area) are engaged, this analysis needs to be carried out separately under each section.

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