

**109-110 Guilford Street,
London**

**Updated Heritage
Statement**

Client: OCEANIC JEWELLERS LTD

AB Heritage Project No:60382

Date:11/05/2017

GLHER Data Licence Number: 13157

109-110 Guilford Street, London

Updated Heritage Statement

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Project Number	60382
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GLHER Data Licence Number	13157

Rev Number	Description	Undertaken	Approved	Date
1.0	ORIGINAL	KKP & DD	AB	27/04/2017
2.0	UPDATE	DD	AB	11/05/2018

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1. INTRODUCTION

1.1 Project Background

- 1.1.1 AB Heritage Limited (hereinafter AB Heritage) has been commissioned by Oceanic Jewellers Ltd to produce a Heritage Statement covering a proposed remodelling and extension at the Grade II Listed 109 -110 Guilford Street, London, WC1N 1DP (National Heritage List for England (NHLE) List Entry Ref: 1271623).
- 1.1.2 In 2017, AB Heritage produced a Historic Environment Desk Based Assessment and Heritage Statement for 109-110 Guilford Street, London (AB Heritage, 2017). That document included an appraisal and assessment of archaeological potential at the site and included an appraisal and assessment of plans to alter internal planform and external features of the buildings.
- 1.1.3 This report is an updated and revised Heritage Statement, which has been requested following correspondence with the Borough Conservation Officer, and the preparation of new designs for the treatment of the internals and exterior of 109-110 Guilford Street. This report does not consider the archaeological potential of the site, as this was satisfactorily covered in the previous report (AB Heritage, 2017)
- 1.1.4 This report includes a description of the baseline conditions; an examination of readily available documentary, cartographic evidence; and identifies any known and potential cultural heritage receptor(s) within the application site. The report also contains a consideration of the setting and significance of the building(s) and any contribution made to that significance by its setting. It proposes a suitable mitigation strategy for heritage, where such works are deemed appropriate.
- 1.1.5 The report concludes with a tabulated assessment of the potential heritage impacts of the proposed designs.

1.2 Statutory Designations

- 1.2.1 The site forms part of a late 18th century Grade II Listed terrace [**AB 22**], forming 105 – 110 Guilford Street. The Listing Description is as follows:

'Terrace of 6 houses. c1792-1800. By James Burton, altered. Nos 105-107, 1st and 2nd floors refronted C20; No.109 totally refronted C20. Multi-coloured stock brick; Nos 105-108 with stucco ground floors. Stucco 1st floor sill bands. Slated mansard roofs (No.109 tiled) with dormers. 3 storeys, attics and basements. 2 windows each. Nos 105 and 110, stucco doorway surrounds with pilasters carrying a simplified, bracketed cornice (No.105 doorway altered); Nos 106 and 107, wooden doorcases with pilasters carrying entablatures with dentil cornices; No.108, earlier C20 stone doorcase with round-arched doorway with radial fanlight; No.109, C20 doorway. Reddened, gauged brick flat arches to recessed sashes, most with 2-panes. Nos 105-107 parapets. Nos 108-110, stone cornices and blocking courses. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas.'

- 1.2.2 The site is located within the Bloomsbury Conservation Area [**AB 30**] and the London Suburbs Archaeological Priority Area (APA) [**AB 4**].

1.3 Site Location & Description

- 1.3.1 The site covers an area of c. 170 sqm and is occupied by 109 -110 Guilford Street, London Borough of Camden. The buildings each comprise three storeys with an attic and basement.
- 1.3.2 The site is bounded by Guilford Street to the south-east, by No. 108 by Guilford Street to the south-west, No. 111 Guilford Street to the north-east and by other properties to the north-west.
- 1.3.3 The site is currently occupied by two Grade II Listed Buildings, which have been converted into student accommodation comprising bedrooms and communal areas. To the rear of No. 110 is a small paved yard.

1.4 Geology & Topography

- 1.4.1 The solid underlying geology comprises London Clay. This is overlain by superficial geological deposits of sand and gravel belonging to the Hackney Gravel Member (British Geological Survey (BGS) 2017).
- 1.4.2 The site is fairly flat and is situated at approximately 20m aOD (Camden Council 2011).

1.5 Proposed Development

- 1.5.1 The proposed development comprises a series of alterations to the existing interiors of both 109 & 110 Guilford Street. Exterior changes are proposed for the rear of 110 Guilford Street. The key features are:
- Single storey ground floor extension to rear of 110 Guilford Street to match 109
 - Extension to rear closet in 110 Guilford Street at first floor level
 - Pitched roof above basement entrance at 109 to change to flat roof as per the original
 - Replacement of like for like sash windows to front and rear of both buildings
 - Inclusion of en-suite bathrooms in the basement, ground, 1st, 2nd and 3rd floors
 - Creation of communal kitchens on ground floors of 109 & 110 Guilford Street
 - Demolition of non-original partition walls, and
 - Rearrangement of some doors
- 1.5.2 The single storey extension proposed for the rear ground floor of No. 110, would bring the rear ground floor level in line with that of No.109.
- 1.5.3 The proposal includes for the upgrade of the current shared facilities, to provide en-suite bedsit units. The proposals are designed to offer a substantial lift in living standards to that currently offered in the building.

2. AIMS & METHODOLOGY

- 2.1.1 Early consultation on the results of cultural heritage research and consideration of the implications of proposed development are the key to informing reasonable planning decisions.
- 2.1.2 National Planning Policy Framework paragraph 128 requires local planning authorities to request descriptions on the significance of any heritage assets affected by a proposal, including any contribution made by their setting. It states:

'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.'

- 2.1.3 The aim of this report is to facilitate such a process by understanding the historical development of the application site and the likely impact upon any historic building resulting from the proposed development, devising appropriate mitigation responses where necessary.

2.2 Aims of Works

- 2.2.1 The assessment has been carried out, in regard to the collation of baseline information, in line with the Chartered Institute for Archaeologists' Standard and Guidance for the archaeological Investigation of Standing Buildings or Structures (December 2014).
- 2.2.2 This assessment includes relevant information contained in various statutory requirements, national, regional and local planning policies and professional good practice guidance, including:
- Ancient Monuments and Archaeological Areas Act, 1979
 - Planning (Listed Buildings and Conservation Areas) Act, 1990
 - The National Planning Policy Framework, 2012
- 2.2.3 The Greater London Historic Environment Record is the primary source of information concerning the current state of archaeological and architectural knowledge in this area. The HER Commercial dataset search reference number for this project is 13157. For reporting purposes, the HER information has been re-numbered with AB numbers, which can be viewed in Appendix 1. The information contained within this database was supported by examination of data from a wide range of other sources, principally:
- The Heritage Gateway (www.heritagegateway.org.uk) for information from Historic England National Monuments Record, Pastscape and other research resources;
 - The Historic England website professional pages, including the National Heritage List for England;
 - A site-walk over was undertaken on the 20th March 2017;
 - A visit to the London Metropolitan Archives on 20th March 2017;

- A visit to the Camden Local Studies and Archives Centre on 20th March 2017;
- Additional relevant documentary and online historic sources;

2.2.4 Information from these sources was used to understand:

- Information on statutory and non-statutory designated sites;
- Information on heritage assets recorded on the HER;
- Readily accessible information on the site's history from readily available historic maps and photographs held at the London Metropolitan Archives and Camden Local Studies and Archives Centre;
- A greater understanding of key cultural heritage issues of the site and surrounding area;

2.2.5 The impact of proposed development on the known and potential cultural heritage resource, resulting in the formulation of a mitigation strategy, where required, which appropriately targets any future works to those required to gain planning consent.

2.3 Consultation & Study Area

- 2.3.1 During consultation regarding the appropriate size of the study area, Sandy Kidd (Archaeological Advisor; Greater London Archaeological Advisory Service (GLAAS)) confirmed with Chloe Smith (Heritage Consultant; AB Heritage) that the usual GLAAS guidelines for London should be applied in this case. In line with these guidelines, based on the site's inner-London location, a study area of 100m was applied for Listed Buildings, to focus the scope of the report appropriately.
- 2.3.2 During October and November 2017, the designs that accompanied the previous Heritage Statement (AB Heritage, 2017), were subject to email discussion between the Juttla Architects (acting for the Client), and Alfie Stroud (Senior Design & Conservation Officer; LB Camden) and Nora-Andreea Constantinescu (Planning Officer – Development Management; LB Camden). These discussions highlighted where the previous designs were thought to cause potential harm to the heritage importance of the Listed Buildings and the Conservation Areas.
- 2.3.3 On 16th April 2018, Daniel Dodds (Principal Heritage Consultant; AB Heritage) attended a design meeting with the Client and their architect. This meeting looked in depth at the 2018 designs and proposals, which were a response to the discussion with the Conservation Officer. The meeting also provided an opportunity for the architects to demonstrate where they had understood the requirements of the Conservation Officer, and where the 2018 designs would avoid direct contact with any historical features or detailing. These designs are assessed in this report.

2.4 Assessment of Cultural Heritage Resource

- 2.4.1 The importance of identified cultural heritage resources is determined by reference to existing designations (Table 1, below).
- 2.4.2 While Historic England uses the terminology 'Significance' to describe the value of a heritage asset, AB Heritage has elected to use the term 'Importance' in this report, in order to avoid any confusion between the assessment of Significance of Effect on our Table 3 and value judgement of a heritage asset.

Table 1: Assessing the Importance of a Cultural Heritage Site

SCALE OF SITE IMPORTANCE	
NATIONAL	The highest status of site, e.g. Scheduled Monuments (or undesignated assets of schedulable quality and importance). Grade I and Grade II* Listed Buildings. Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade. Conservation Areas containing very important buildings. Undesignated structures of clear national importance. Extremely well preserved historic landscape, whether inscribed or not, with exceptional coherence, time depth, or other critical factor(s).
REGIONAL	Grade II Listed Buildings or other designated or undesignated archaeological sites (in addition to those listed above), or assets of a reasonably defined extent and significance, or reasonable evidence of occupation / settlement, ritual, industrial activity etc. Examples may include areas containing buildings that contribute significantly to its historic character, burial sites, deserted medieval villages, Roman roads and dense scatter of finds.
LOCAL	Evidence of human activity more limited in historic value than the examples above, or compromised by poor preservation and/or survival of context associations, though which still have the potential to contribute to local research objectives. Examples include sites such as 'locally designated' buildings or undesignated structures / buildings of limited historic merit, out-of-situ archaeological findspots / ephemeral archaeological evidence and historic field systems and boundaries etc.
NEGLIGIBLE	Assets with very little or no surviving archaeological interest. Examples include destroyed antiquities, structures of almost no architectural / historic merit, buildings of an intrusive character or relatively modern / common landscape features such as quarries, drains and ponds etc.
UNKNOWN	Insufficient information exists to assess the importance of a feature (e.g. unidentified features on aerial photographs).

- 2.4.3 The importance of already identified cultural heritage resources is determined by reference to existing designations. Where classification of a receptor's value covered a range of the above possibilities or for previously unidentified features where no designation has been assigned, the value of the receptor was based on professional knowledge and judgement.
- 2.4.4 For some types of finds or remains there is no consistent value and the importance may vary, for example Grade II Listed Buildings and Conservation Areas. For this reason, adjustments are occasionally made, where appropriate, based on professional judgement.

2.5 Impact Assessment Criteria

- 2.5.1 The magnitude of impact upon the archaeological and heritage resource, which can be considered in terms of direct and indirect impacts, is determined by identifying the level of effect from the proposed development upon the baseline conditions of the site and the cultural heritage resource identified. The criteria for assessing the magnitude of impact are set out in Table 2 (below).
- 2.5.2 In certain cases it is not possible to confirm the magnitude of impact upon a cultural heritage resource, especially where anticipated buried deposits exist. Where possible a professional judgement as to the scale of such impacts is applied to enable the likely 'Significance of Effects' to be established; however, a magnitude level of 'uncertain' is included for situations where it is simply not appropriate to make such a judgement at this stage of works.

Table 2: Criteria for Determining Magnitude of Impact

IMPACT LEVEL	DEFINITION
HIGH	Changes to most or all of the key archaeological or key heritage baseline elements, or comprehensive changes to the setting of such key features that lead to total or almost complete alteration of a features physical structure, dramatic visual alteration to the setting of a heritage asset, or almost comprehensive variation to aspects such as noise, access, or visual amenity of the historic landscape.
MEDIUM	Changes to many key archaeological materials/historic elements, or their setting, such that the baseline resource is clearly modified. This includes considerable visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, and considerable changes to use or access changes to key historic landscape elements
LOW	Detectable impacts which alter the baseline condition of an archaeological or heritage receptor to a slight degree – e.g. a small proportion of the surviving heritage resource is altered; slight alterations to the setting or structure, or limited changes to aspects such as noise levels, use or access that results in limited changes to historic landscape character.
NEGLIGIBLE	Barely distinguishable change from baseline conditions, where there would be very little appreciable effect on a known site, possibly because of distance from the development, method of construction or landscape or ecological planting, that are thought to have no long term effect on the historic value of a resource.
UNCERTAIN	Extent / nature of the resource is unknown and the magnitude of change cannot be ascertained.

- 2.5.3 The overall Significance of Effects from the proposed development upon the Cultural Heritage Resource is determined by correlating the magnitude of Impact against value of the Cultural Heritage resource. Table 3 highlights the criteria for assessing the overall Significance of Effects. Where effects are moderate or above these are classified as significant.

Table 3: Significance of Effects

IMPORTANCE	MAGNITUDE			
	HIGH	MED	LOW	NEG
NATIONAL	Severe	Major	Mod	Minor
REGIONAL	Major	Mod	Minor	Not Sig.
LOCAL	Mod	Minor	Minor	Not Sig.
NEGLIGIBLE	Minor	Not Sig.	Not Sig.	Nt.

Not Sig. = Not Significant; Nt. = Neutral; Mod = Moderate

2.6 Limitations

- 2.6.1 It should be noted that the report has been prepared under the express instruction and solely for the use of Oceanic Jewellers Ltd, and any associated parties they elect to share this information with. Measurements and distances referred to in the report should be taken as approximations only and should not be used for detailed design purposes.
- 2.6.2 All the work carried out in this report is based upon the professional knowledge and understanding of AB Heritage on current (April 2018) and relevant United Kingdom standards and codes, technology and legislation. Changes in these areas may occur in the future and cause changes to the conclusions, advice, recommendations or design given. AB Heritage does not accept responsibility for advising the client's or associated parties of the facts or implications of any such changes in the future.
- 2.6.3 This report has been prepared utilising factual information obtained from third party sources. AB Heritage takes no responsibility for the accuracy of such information. It should also be noted that this report represents an early stage of a phased approach to assessing the archaeological and cultural heritage resource of the application site to allow the development of an appropriate mitigation strategy, should this be required. It does not comprise mitigation of impacts in itself.

3. PLANNING & LEGISLATIVE FRAMEWORK

3.1 Introduction

- 3.1.1 The following section highlights the key planning and legislative framework relevant to this project, including legislative framework, national planning policy and relevant sector guidance.

3.2 Statutory Protection for Heritage Assets

- 3.2.1 Current legislation, in the form of the Ancient Monuments and Archaeological Areas Act 1979, provides for the legal protection of important and well-preserved archaeological sites and monuments through their addition to a list, or 'schedule' of archaeological monuments by the Secretary of State for Culture, Media and Sport. This necessitates the granting of formal Scheduled Monument Consent for any work undertaken within the designated area of a Scheduled Ancient Monument.
- 3.2.2 Likewise, structures are afforded legal protection in the form of their addition to 'lists' of buildings of special architectural or historical interest. The listing of buildings is carried out by the Department of Culture, Media and Sport under the Planning (Listed Buildings and Conservation Areas) Act, 1990. The main purpose of the legislation is to protect buildings and their surroundings from changes that would materially alter the special historic or architectural value of the building or its setting. This necessitates the granting of formal Listed Building Consent for all works undertaken to or within the designated curtilage of a Listed Building. This legislation also allows for the creation and protection of Conservation Areas by local planning authorities to protect areas and groupings of historical significance.
- 3.2.3 The categories of assets with some form of legal protection have been extended in recent years, and now include Registered Parks and Gardens, and Historic Battlefields. While designation as a UNESCO World Heritage Site is not a statutory designation under English planning law, such a designation is regarded as a material consideration in planning decisions, and World Heritage Sites are in practice protected from development that could affect any aspect of their significance including settings within the Site and a buffer zone around it.

3.3 National Planning Policy

- 3.3.1 The NPPF sets out government policy on the historic environment, which covers all elements, whether designated or not, that are identified as 'having a degree of significance meriting consideration in planning decisions, because of its heritage interest'.
- 3.3.2 One of the over-arching aims is to 'Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'. To achieve this, local planning authorities can request that the applicant describe "the significance of any heritage assets affected, including any contribution made by their setting". The level of detail required in the assessment should be "proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance". It goes on to say that "where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest,

local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.”

- 3.3.3 A key policy within the NPPF is 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.
- 3.3.4 With regard to non-designated heritage assets specific policy is provided in that a balanced judgement will be required having due regard to the scale of any harm or loss and the significance of the heritage asset affected.
- 3.3.5 Paragraph 132 states that ‘Significance can be harmed or lost through alteration or destruction of a heritage asset or development within its setting. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional, while substantial harm to or loss of designated heritage assets of the highest significance, should be wholly exceptional’.
- 3.3.6 Paragraphs 133 & 134 explain that ‘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.
- 3.3.7 It also advises that where a proposal involve 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. 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.

3.4 The London Plan 2011

Historic Environment & Landscapes, with March 2016 alterations

Policy 7.8 (Heritage Assets and Archaeology)

- 3.4.1 This policy states that development should incorporate measures that identify, record, interpret, protect, and where possible, present the site’s heritage assets, whether designated or non-designated.
- 3.4.2 Based on this policy, planning decisions involving heritage assets will be assessed on the level of identification, value, conservation, restoration, re-use and incorporation of the asset in the proposed plans. The significance of heritage assets and their settings should be conserved by proposals which are sympathetic to the form, scale, materials and architectural detail of the asset.
- 3.4.3 Any development which will cause substantial harm or loss of a designated heritage asset will only be accepted in exceptional circumstances. The importance of the development will be assessed proportionately in terms of public benefit against the impact on, and the importance of the asset.

3.5 London Borough of Camden Local Development Framework

Core Strategy and Development Policies (adopted November 2010)

CS14: Promoting high quality places and conserving our heritage

- 3.5.1 The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:
- 3.5.2 a) requiring development of the highest standard of design that respects local context and character;
- 3.5.3 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;
- 3.5.4 c) promoting high quality landscaping and works to streets and public spaces;
- 3.5.5 d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
- 3.5.6 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.

DP25: Conserving Camden's heritage

- Conservation Areas

- 3.5.7 In order to maintain the character of Camden's conservation areas, the Council will:
- 3.5.8 a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- 3.5.9 b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- 3.5.10 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 these harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- 3.5.11 d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- 3.5.12 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

- 3.5.13 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.

3.6 Supplementary Planning Guidance

Bloomsbury Conservation Area Appraisal & Management Strategy (adopted April 2011)

- 3.6.1 High quality new development that is appropriate for its context can preserve or enhance the Conservation Area. To secure appropriate new development the Council has adopted a number of detailed policies (see paragraphs 3.6.2 to 3.6.8 below) that development will need to comply with. An appropriate level of information will also be required as part of the application submission to enable the Council to determine the effect of any development proposal on the character or appearance of the Conservation Area.
- 3.6.2 Development proposals must preserve or enhance the character or appearance of the Bloomsbury Conservation Area. This requirement applies equally to developments which are outside the Conservation Area but would affect its setting or views into or out of the area.
- 3.6.3 High quality design and high-quality execution will be required of all new development at all scales. It will be important that applications contain sufficient information to enable the Council to assess the proposals.
- 3.6.4 Proposals which seek to redevelop those buildings and spaces which are considered to have a negative impact on the special character or the appearance of the Conservation Area with appropriate new development will be encouraged.
- 3.6.5 Design and Access Statements accompanying applications will be expected to address the particular characteristics identified in the appraisal including the formality and regularity of terraced forms and the prevailing scale, mass, form and rhythm created by the historic pattern of development. The appraisal has demonstrated that a high quality successful modern design can be accommodated and enhance the Conservation Area, by carefully assessing and responding to the form and qualities of surrounding buildings and spaces.
- 3.6.6 The appearance of all buildings of historic interest (listed and unlisted) within the Conservation Area is harmed by the removal or loss of original architectural features and the use of inappropriate materials. For example, the loss of original joinery, sash windows, porches and front doors, can have considerable negative impact on the appearance of a historic building and the area. Insensitive re-pointing, painting or inappropriate render will harm the appearance and the long-term durability of historic brickwork.
- 3.6.7 In all cases the Council will expect original architectural features and detailing to be retained, repaired, protected, or refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair.
- 3.6.8 In preparing development proposals consideration should be given to whether the development will affect an Archaeological Priority Area (APA) or view corridors to and from St Paul's. Significant local views will also be taken into consideration.

4. CULTURAL HERITAGE RESOURCE BASELINE

4.1 Known Cultural Heritage Assets

Within the Proposed Development Site

- The site forms part of a Grade II Listed terrace of late 18th century town houses (No. 105 – 110 Guilford Street) [AB 22];
- It is located within the Bloomsbury Conservation Area [AB 30], designated as a significant example of Post-Medieval town planning;

Within the Study Area

4.1.1 An additional twenty-nine heritage features have been recorded within the study area. These comprise:

- The Grade I Listed former home of Charles Dickens [AB 26], located c. 80m to the south;
- The Grade II* Listed early 19th century terrace of No. 11 – 26 Mecklenburgh Square [AB 16], centred c. 150m to the north-west;
- Fifteen Grade II Listed Buildings [AB 12 – 15, 17 – 21, 23 – 25, 27, 29 & 31]. These mostly comprise early 19th century terraces, amongst other features. The closest of which are two bollards flanking the entrance to Brownlow Mews [AB 23], located c. 15m to the south of the site;
- The Grade II Listed Historical Park & Garden of the mid-18th century Coram's Field with Brunswick & Mucklenburgh Squares [AB 11], centred c. 275m to the west and
- The remaining eleven heritage features [AB 1- 3, 5, 7 – 10, 28, 32 & 33], relate to the occupation and defence of the area, from the Prehistoric period onwards.

4.2 Historical Background

The Post Medieval Period (AD 1537 – AD 1900)

- 4.2.1 Following the Restoration in 1660, the development of the region on the north side of Holborn took off, with the creation of fashionable new suburbs, inspired by the development of Covent Garden. Further to the north, the Foundling Hospital was founded in 1742 by Captain Thomas Coram, who had been shocked by the state of London's poorest children, that was completed in 1753. Fifty-six acres (c. 23ha) of land were found in Lamb's Conduit Fields and the Trustees purchased it. The plan was to develop the surrounding estate to provide ground rents to support the Hospital but also to retain the open situation. To the north of the Hospital, gardens were laid out [AB 11].
- 4.2.2 The Rocque map of 1746 (Plate 1) shows the new suburban development spreading north from Holborn and the Foundling Hospital to the north, surrounded by gardens and open land.

The approximate area occupied by the proposed development site (dashed circle in red near the centre of the map) appears to be occupied by a pit, that may represent a quarry.

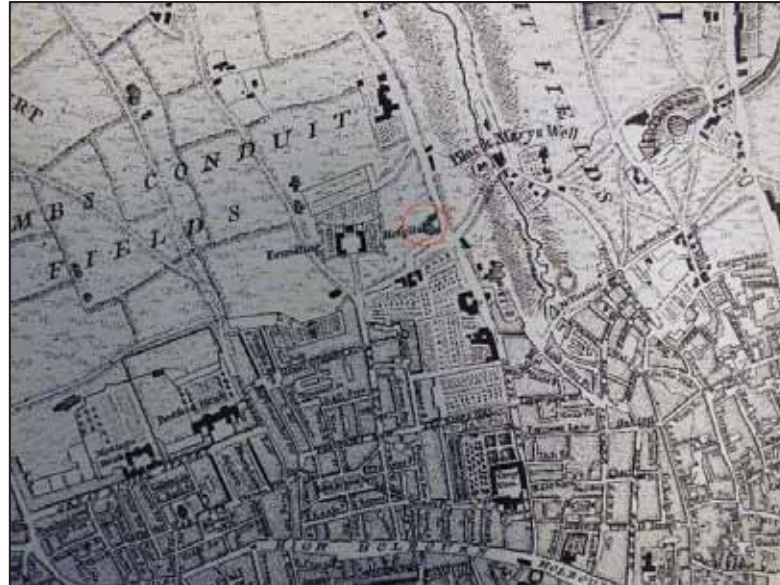


Plate 1: Rocque's Map of 1746 (Approx. location of site dashed in red) (London Metropolitan Archives)

- 4.2.3 In 1790 the Foundling Hospital needed funds and so released some land for development. The resulting adjacent street grid was created, mainly by architect James Burton, along with the twin squares of Brunswick and Mecklenburgh (Camden Council, 2011). The terrace that contains 109 – 110 Guilford Street was one of those built by James Burton around c. 1792. This terrace when built formed the north side of Queen Square.
- 4.2.4 The Horwood Map of 1794 – 99 (Plate 2) shows that in the intervening decades since the previous map, the suburban development has continued further north, right up to the southern edge of the Foundling Hospital complex. The existing road layout has been created and No. 109 – 110 Guilford Street are shown, although not in a large amount of detail.

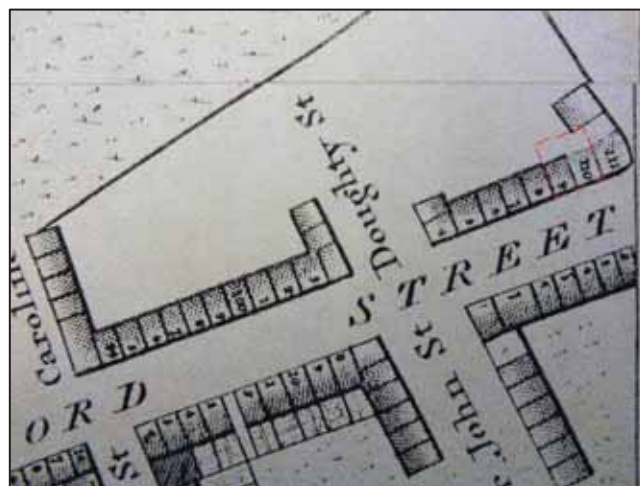


Plate 2: Horwood Map, 1794 – 99 (London Metropolitan Archives)

- 4.2.5 The area to the east of Gray's Inn Road was developed from the early 19th century onwards, although the Napoleonic Wars had the result of slowing the rate of the building, due to a rise in the cost of building materials and a scarcity of credit. A depression in the building trade during the 1830s slowed the final stages of the development of the Bloomsbury area.
- 4.2.6 The Plan of the Parish of St Pancras dating to 1801 (Plate 3) is the earliest map that shows the buildings at 109 -110 Guilford Street in detail. The buildings appear to be numbered 2 & 3 Guilford Street and are shown with linear gardens extending to the north at the rear of the houses. Outbuildings are shown along the eastern boundary of the rear gardens.

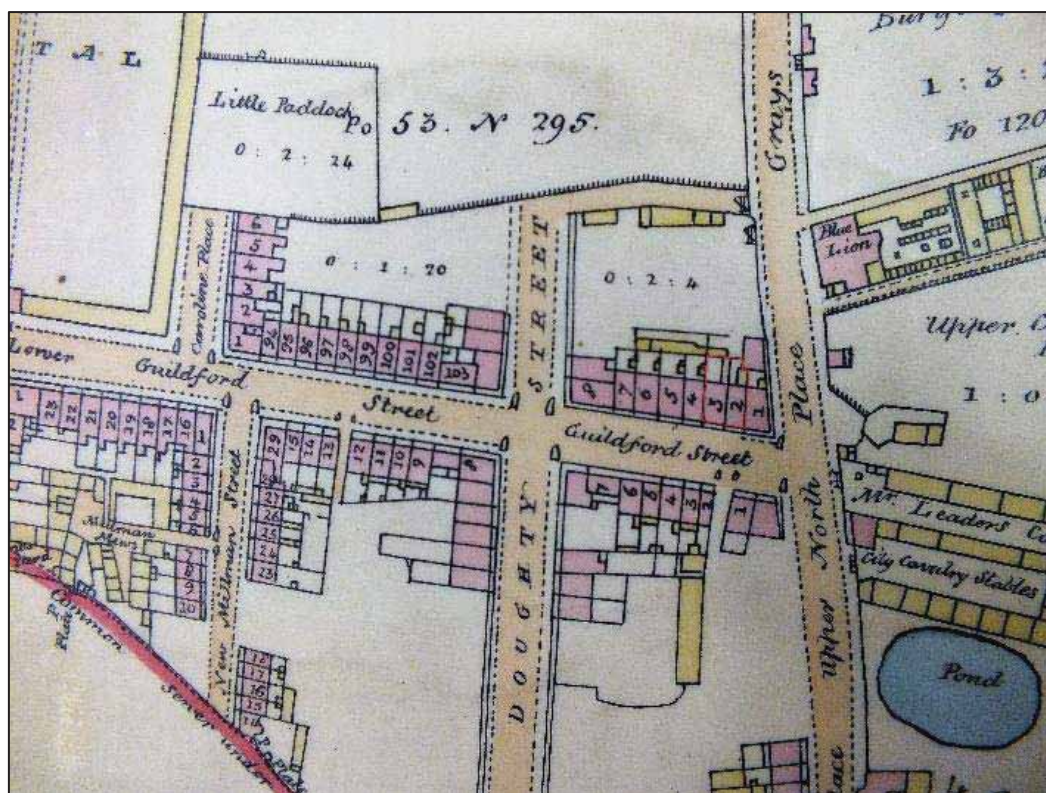


Plate 3: Plan of the Parish of St Pancras, 1801 (Camden Local Studies & Archive Centre)

- 4.2.7 The growth in the population of the Bloomsbury region during the late 18th – early 19th century gave rise to the need for public buildings such as places of worship and hospitals including Great Ormond Street Children's Hospital [AB 28], originally founded in a domestic property prior to purpose-built premises that was constructed in the 1870s c. 350m to the south-west of the site.
- 4.2.8 The 1849 Parish Tithe Map of St Pancras (Plate 4) shows the development around the site has continued during the intervening decades since the previous map, particularly along Gray's Inn Road to the east. As a result, the garden of No. 110 Guilford Street appears to have been infilled and No. 109 appears to be absent altogether.

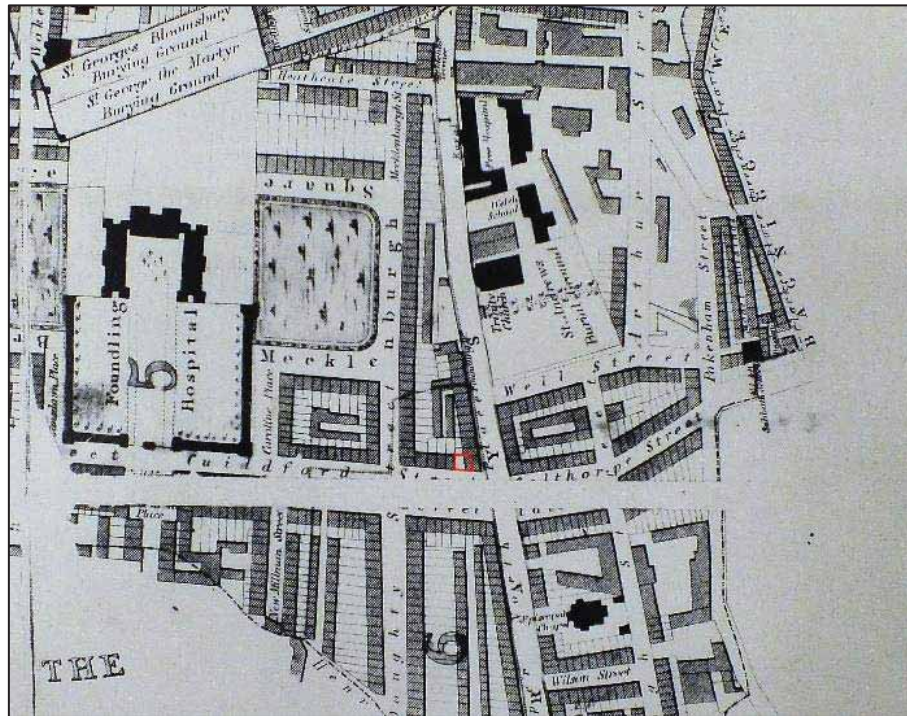


Plate 4: St Pancras Parish Tithe Map, 1849 (Camden Local Studies & Archive Centre)

- 4.2.9 The 1871 edition of the 25" OS map (Plate 5) shows both buildings with basement wells at the front, adjacent to the pavement. It appears that No. 109 has possibly been reconstructed since the previous map. Linear gardens are shown at the rear of both properties. There is a small outbuilding adjacent to the rear of the main part of No. 110.



Plate 5: 25" OS map, 1871 (Camden Local Studies & Archive Centre)

- 4.2.10 The 1894 -96 edition of the 25" OS map (Plate 6) shows the buildings much as they were depicted on the previous map, although the western side of No. 109 has been extended to the rear and an outbuilding is shown between the two rear extensions.

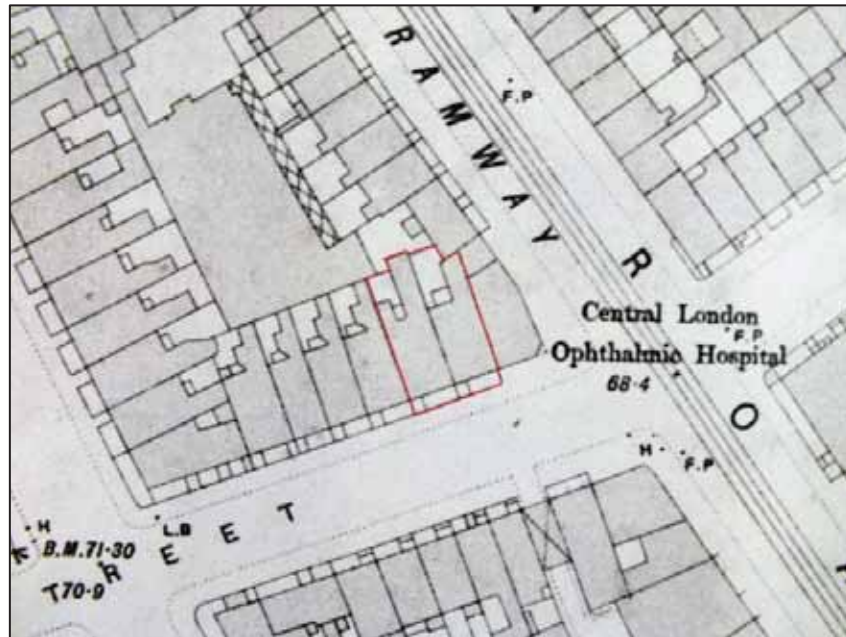


Plate 6: 25" OS Map, 1894 -96 (Camden Local Studies & Archive Centre)

- 4.2.11 Throughout the 19th century, the desirability of the formerly fashionable terraces of Bloomsbury began to wane. They were replaced in popularity by the villa developments to the north and west, such as Belsize Park and St John's Wood. This resulted in the conversion of several of the properties to none residential uses and many shops were inserted into the ground floors of many of them during the 19th century.

Modern Period (AD 1901 – present)

- 4.2.12 During the early 20th century, conversion of the residential properties continued at large along with new development in the region of the University of London. Further public amenities continued to develop, including the Royal Free Auxiliary Hospital [AB 32], constructed in 1915 c. 200m to the north-east of the site. Hotel and office developments continued to proliferate throughout the area, particularly large footprint, steel-framed buildings of a commercial nature.
- 4.2.13 Much alteration to the existing buildings in the region was undertaken during the 20th century, in addition to reconstruction following wartime bomb damage, particularly in the most damaged areas around Theobald's Road, High Holborn, Brunswick Square, Red Lion Square and the area south of King's Cross. Many of the properties in the terrace of which the site forms a part, were re-fronted during the 20th century, including No 109.
- 4.2.14 The 1921 & 1938 editions of the 25" OS map (not reproduced) show the site much as it was depicted on the late 19th century edition (Plate 6). The 1951 & 1960 (Plate 7) edition of the 1:1,250 OS map, shows a glass extension or conservatory on the northern end of No. 109. This is shown as a solid extension on the 1982 OS map.

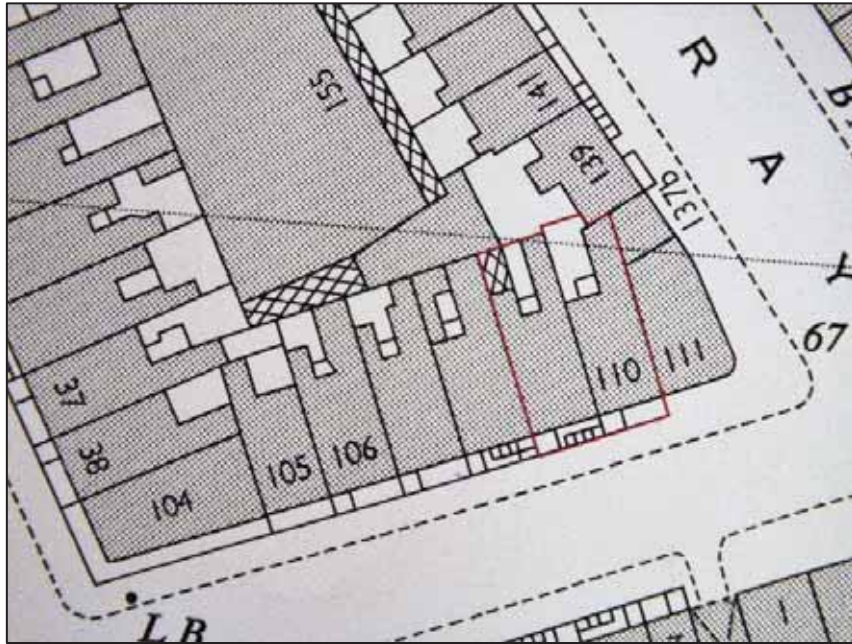


Plate 7: 1:1,250 OS Map, 1960 (Camden Local Studies & Archive Centre)



Photo 1: Front façade of Nos. 109 (left) and 110 (right) Guilford Street, looking northwest

5. CONDITION OF 109 – 110 GUILFORD STREET

- 5.1.1 A site visit was undertaken by Chloe Smith (Heritage Consultant; AB Heritage) on the 20th March 2017. She was accompanied by Guni Suri, on behalf of the owner of the property, Oceanic Jewellers Ltd.
- 5.1.2 The purpose of this visit was to gain a greater understanding of the level of survival of significant architectural details.
- 5.1.3 The site is located on the northern side of Guilford Street and is occupied by Nos. 109 and 110 Guilford Street, that form part of a terrace of town houses. The buildings comprise three storeys plus basement and attic levels. They are constructed of yellow stock brick with reddened brick window arches on the south-eastern façade. Single-glazed wooden sash windows are presented in the south-eastern façade from basement to second floor level, while casement windows are used in the attic level, all of which are later replacements. Black metal railings, mentioned in the listing description, mark the south-eastern boundary of the site, adjacent to the pavement (Photo 1).
- 5.1.4 To the rear there have been several extensions from the original plan of the building. No 109 has a rear ground floor extension, which extends the full width of the property to the north-western boundary. An additional narrow extension of 2.5 storeys, provides additional space at the half-landing level between the ground and first floor and a smaller space between the first and second floors (Photo 2).
- 5.1.5 No. 110 also has a narrow 1.5 storeys extension, providing space at the half-landing level between the ground and first floors. There is also a later L-shaped ground floor extension of modern brick, which does not occupy the full plot, leaving a small area of yard space at the rear of the property.



Photo 2: Rear elevation for Nos. 110 (left) and 109 (right) Guilford Street, looking south-east

- 5.1.6 To the rear of No. 110 is a small yard area, which is the site of the proposed extension. This area is enclosed by brick walls and is paved with large concrete slabs (Photo 3).



Photo 3: Yard area to the rear of No. 110, looking west

- 5.1.7 The buildings are currently in use as student accommodation and have been internally re-arranged and comprise mainly rooms that have been converted to bedrooms (with en-suite shower rooms in No 109 and communal bathrooms in No 110), and communal areas including kitchens, laundry areas and storage. Several of the principal rooms have been subdivided and internal stud walls have been erected throughout to form corridors to allow access between rooms. This has resulted in fragmentation of the original planform of the building. Most doors, particularly in No. 110, are later or modern replacements.
- 5.1.8 Despite previous remodelling phases, a number of significant internal historic features survive. In No. 109, the architrave and cornice in the basement level are all modern insertions of little or no historical significance, as is the stairs and stairway panelling.
- 5.1.9 At ground floor level, original skirting board, picture rail and door architrave is present within the principal rooms, although the cornice has been replaced in the central room. All details have been replaced in the hallway along with the lower portion of the stairs. The front principal room has a curved rear wall and surviving moulded plaster corncings, ceiling rose, dado rail and picture rail (Photo 6). The central ground floor room has an original c. late 18th century fire surround with central decorative panel, like that in Photo 5. Later panelling is present in the ground floor entrance hall.
- 5.1.10 At first floor level, the principal rooms of No. 109 retain some original skirting board, only part of the original cornice in the front room and both c. late 18th century fire surrounds in the principal rooms (Photo 4 & 5). At second floor level, original door and window architrave is present in the communal kitchen area and front principal room, although the cornice has been replaced.



Photo 4: Original Regency fireplace in No 109: first floor, front bedroom



Photo 5: Original Regency fireplace in no 109: first floor, rear bedroom

5.1.11 At third floor level, the architectural details are limited and largely replacements, apart from a plain c. late 18th century fire surround in the front room, which also has a built-in cupboard. Panelling is present in the third-floor stair lobby, which may be original (Photo 7).



Photo 6: Ceiling rose and decorative cornice in no. 109: ground floor, front bedroom



Photo 7: Wooden panelling and blocked door in No. 109 third floor / attic level, hallway

- 5.1.12 The basement level of No. 110 is much the same as No. 109, with modern architectural details added, which are of limited, if any historical importance. The rear part of the ground floor is entirely modern and contains no features of historic value. The ground floor entrance hall has an original entablature style entrance with pilasters and a rectangular overhead light with glazing bars.
- 5.1.13 The remainder of the ground floor has a high level of surviving original door and window architrave and panelled reveals. The front room has the original cornicing, picture rail and dado rail, although some has been replaced on the chimney breast. A blocked doorway between the principal rooms retains the original door architrave. The ground floor staircase mirrors the remainder of the original stairs in No. 109 and is open string on the lower section and closed string on the upper floors.
- 5.1.14 At first-floor level, the principal rooms have lost their original fire surrounds although the door and window architrave survives (Photo 8), as do the cornices and later skirting boards. The second floor is much the same, with no surviving fire surrounds and only the original door and window architrave. The third floor is in much the same condition, although would likely have had less detailing originally.



Photo 8: Wooden panelling in window reveal in No. 110: first floor, front bedroom

- 5.1.15 The proposed development includes an extension to No. 110, to fill the area between the adjacent properties to the east and north. This area is surrounded on 3 sides by brick walls to a height of at least two storeys. Views from this area are predominantly towards the rear of the properties within the block formed by Guilford Street, Gray's Inn Road and Doughty Street, and there are no views from this area into the wider streetscape (Photo 9 - 11).



Photo 9: View from the rear window of No.110 into the area to be developed, looking west



Photo 10: View towards area to be developed from No. 109, looking north-east



Photo 11: View from No.109, looking north-west

6. SETTING OF 109 – 110 GUILFORD STREET

- 6.1.1 The site faces south onto Guilford Street, which contains a mixture of modern flat developments and the remnants of late 18th – early 19th century terraces of three or four storey town houses, raised on basements and fronted by cast-iron railings. Many back directly onto the adjacent properties or have small, rear linear gardens or yards (Camden Council, 2011).
- 6.1.2 The vertical proportions of the frontages adhere to classical architectural principles, with a repeated rhythm of window and door openings along each terrace. The terraces have an overall homogeneous perception but there is subtle variation in the detailing of the terraces, which is derived predominantly from piecemeal rebuilding during the 20th century (Photo 12).



Photo 12: The eastern end of the north side of Guilford Street, from the south-east

- 6.1.3 The strong uniform appearance is achieved through the consistency of the construction materials, with the prevailing materials being London stock brick with some contrasting red brick detailing (such as segmental red-brick arches). Some stucco is evident at ground floor level. Most of the frontages along Guilford Street are topped with mansard attics and dormer windows behind (Photo 12).
- 6.1.4 The rear of the site is enclosed by the rear of the adjacent buildings, as mentioned above in Section 5.1.15 (Photo 9 – 11). The views into and out of the ground floor level of the rear of the site, are limited by the proximity of the adjacent buildings and this elevation does not form a part of any of the significant views with the Bloomsbury Conservation Area.
- 6.1.5 The adjacent grids of streets predominantly comprise a similar composition, some with rear Mews, although there is the intermittent modern office block (Photo 13). This remnant historic element is an important characteristic and the continuous building frontage created by the terraces creates a strong sense of enclosure.



Photo 13: View from the front of No. 110 Guilford Street towards the east

- 6.1.6 The former predominantly residential area now has a mixture of uses, with some now used as offices. Guilford Street and Rugby Street have a more commercial element than other streets.
- 6.1.7 Gray's Inn Road forms a dominant tree-lined avenue with wide pavements, to the east of the site. Further streets of terrace dominate the area to the south of the Guilford Street, which contribute positively to the character of the area.
- 6.1.8 The secondary streets in the area, such as Great James Street, Millman Street, and the stretches of Rugby Street, Great Ormond Street and Sandland Street, share many of the characteristics of the main streets, but are generally narrower and less grand in nature.
- 6.1.9 The setting of 109 – 110 Guilford Street is considered to form a Medium – High Positive contribution towards the significance of the buildings as heritage assets. This is because they form a part of the planned development of the area that took hold from the 17th century onwards, the character and form of which, remains largely intact.

7. STATEMENT OF SIGNIFICANCE

- 7.1.1 The late 18th century Grade II Listed terrace [AB 22], of which the site forms a part is a heritage asset of Regional significance (in line with Table 1, Section 2.4). This is because it is considered by Historic England to be a heritage asset of special interest.
- 7.1.2 The Bloomsbury Conservation Area [AB 30] is a heritage asset of National Significance.
- 7.1.3 As discussed in Section 6.1.9 above, the setting of 109 - 110 Guilford Street [AB 22] is thought to make a Medium – High Positive contribution towards the significance of the buildings, due to forming part of a significant example of Post-Medieval town planning.
- 7.1.4 Although No.109 was re-fronted during the 20th century, and the interior of both properties have undergone a degree of partitioning to turn them into student accommodation, a medium level of original architectural details survives, such as the moulded cornicing, original fire surrounds and door and window architrave (Photos 4 – 8), which are outlined in Section 5.
- 7.1.5 These original surviving elements of the architectural details of the buildings make it possible to still identify the hierarchy of the rooms, with the more elaborate decorative details within the principal rooms and circulation areas of the house, with the basement and upper floors naturally displaying more subtle details. Individually, and as a group within their original context, these surviving details contribute positively towards the significance of the buildings to a High degree. The later additions and modern insertions are thought to have limited historical value at most. This is because these elements are not thought to be of historical significance or to contribute to the significance of the buildings as heritage assets.
- 7.1.6 In addition, the original plan form remains distinguishable and the overall external appearance retains its Regency design and proportions.
- 7.1.7 Therefore, these elements form the evidential and illustrative historical values of the buildings, which are thought to make a High Positive contribution towards their significance, and that of the character and significance of the Bloomsbury Conservation Area [AB 30]. This is because of the information that the surviving elements of original architectural detail and the buildings provide about the external and internal architectural style of the Regency period, as well as their positive contribution towards the character of the surrounding Conservation Area.
- 7.1.8 The buildings are also considered to have an aesthetic value, but to a lesser degree.

8. PREDICTED HERITAGE IMPACT

8.1 Summary of Proposed Development

8.1.1 The proposals involve the following change:

- Single storey ground floor extension to rear of 110 Guilford Street to match 109
- Extension to rear closet in 110 Guilford Street at first floor level
- Pitched roof above basement entrance at 109 to change to flat roof as per the original
- Inclusion of en-suite bathrooms in the basement, 1st, 2nd and 3rd floors
- Creation of communal kitchens on ground floors of 109 & 110 Guilford Street
- Demolition of non-original partition walls, and
- Rearrangement of some doors

8.2 External Alterations (Both Buildings)

Proposed Extension to Rear of No. 110

- 8.2.1 With regard to the proposed extension to the rear of No. 110, the proposal is for the construction of a flat roof over the enclosed space formed by the brick walls of the surrounding properties (Photos 2 & 3), to ground floor height (Fig 7). This would result in a match of rear planform with the adjacent number 109 Guilford Street, to be constructed with matching/similar materials.
- 8.2.2 It is considered that, in line with Table 2, the proposed extension would have Low Adverse Direct Magnitude of Impact on the fabric and understanding of 110 Guilford Street. This is because the proposal would have a 'detectable impact which alters the baseline condition of the heritage receptor to a slight degree'. While it is accepted that the planform of the building will be altered at ground floor level, this would not be sufficient to disrupt the overall understanding of the Listed Building. In line with Table 3, this would equate to a Direct Minor Adverse Significance of Effects on the fabric and understanding of 110 Guilford Street, which in NPPF terms is Less Than Substantial Harm.
- 8.2.3 With regard the potential impact of the proposed extension on the Conservation Area, the rear of the site is enclosed by the rear of the adjacent buildings, as mentioned above in Section 5.1.15 (Photo 9 – 11) and this elevation does not form a part of any of the significant views with the Bloomsbury Conservation Area. It is therefore considered that the proposed ground floor extension at No. 110 Negligible Adverse Magnitude of Impact (Table 2) i.e. 'Barely distinguishable change from baseline conditions...because method of construction [it is] thought to have no long-term effect on the historic value of the resource'. This is because while the rear yard will be roofed, it is not considered that this will interfere with the setting of the Conservation Area owing to the secluded and enclosed nature of the site. In line with Table 3, this results in an Indirect Minor Adverse Significance of Effects on the Conservation Area, which is Less Than Substantial Harm in NPPF terms.

Proposed Extension to WC to Rear of No. 110

- 8.2.4 The latest designs include an extension to the rear closet of 110 Guilford Street at first floor level. Currently there is an existing, yellow stock brick rear extension which houses a small WC off the first-floor landing (Photo 2). The revised design proposes to extend this by just enough to fit a single shower, thus creating a combined shower and WC that will serve the Proposed Unit 5. This design would reduce the requirement to try and fit extra facilities into the first floor of No. 110, whilst keeping the perceived impacts to the secluded rear of the property.
- 8.2.5 In line with Table 2, the proposed extension to the closet is considered to be a Direct Low Magnitude of Impact on the Fabric of No. 110 Guilford Street i.e. a 'detectable impact which alters the baseline condition of the heritage receptor to a slight degree'. While it is accepted that the planform of the building will be very slightly altered at first floor level, this would not be sufficient to disrupt the overall understanding of the Listed Building. In line with Table 3, this would equate to a Minor Adverse Significance of Effects upon the Fabric of No. 110, which is Less Than Substantial Harm in NPPF Terms
- 8.2.6 It is considered that in line with Table 2, the Magnitude of Impact upon the setting of the Conservation Area will be Negligible Adverse having a 'barely distinguishable change from baseline conditions', blending in with the general character of the rear of the terrace. In line with Table 3, this results in an Indirect Minor Adverse Significance of Effects upon the setting of the Conservation Area, which is Less Than Substantial Harm in NPPF terms.

Alteration to Pitched Roof at Basement of No. 109

- 8.2.7 The existing roof/shelter that lies above the basement entrance door to No. 109, is of a pitched and orange tiled design. This design is considered to be out of step with the other properties on the terrace, in particular No. 108 next door which has a flat roof.
- 8.2.8 It is proposed that the existing roof/shelter be changed to a flat roof to match that of the adjoining building, 108 Guilford Street (Fig 7). This change, in line with Table 2, is considered to be a Negligible Beneficial Magnitude of Effects upon both the setting of the Conservation Area and the Grade II Listed No. 109 Guilford Street. In line with Table 3, this results in a Minor Beneficial Significance of Effects upon the setting of the Conservation Area and the Listed Heritage Assets of Nos. 109 & 110 Guilford Street.

8.3 Interior Alterations (No 109 Guilford Street)

- 8.3.1 The following description of predicted impacts will follow a floor by floor analysis, starting at the basement through to the roof. This description will be focussed on areas of key change and will reference the appropriate architectural drawings.
- 8.3.2 After receiving advice from the Borough Conservation Officer, the applicant and their architects have given much consideration to the retention of historic features and fabric within Nos. 109 & 110 Guilford Street. The enclosed demolition plans (Figs 4 - 6) and the plans for the proposed work (Fig 7) show that no original walls or other key features are to be removed or truncated.

Basement

- 8.3.3 Proposed alterations to the basement are minimal and are restricted to the removal of non-original walls in the existing Bedroom 1 (Demolition Plan, Fig 4), and the creation of an en-suite in existing basement kitchen of No.109, which the proposal intends as Unit 6 (Fig 7). No historic fabric or features will be affected by this proposal. Therefore, it is considered the proposals will have a No Heritage Impact on the basement of No. 109.

Ground Floor

- 8.3.4 No demolitions are intended for the Ground Floor of No. 109 Guilford Street (Demolition Plan, Fig 4).
- 8.3.5 The proposal is for this existing Bedroom 2 to be converted to a communal kitchen, and this includes the addition of a central island, with cooker and facilities being located along the south-west wall of the room. The proposal will retain the historic curved back wall. This design ensures that no fittings or fixings are made to the historic fireplace, or other surviving historical details in the room. The design also ensures room regains its central importance within the building as the main socialising and entertaining area in the house. This reflects the importance the original Drawing Room would have had in a Regency era, middle class family home. The central island allows for good circulation around the room (Fig 7).
- 8.3.6 Further alteration is proposed to the rear of the existing Bedroom 4 (within an extension to the original building) with the addition of metal stud partition walls to create an en-suite for the proposed Unit 4. The stud walls will not truncate or affix to any historical features or details and are a reversible portioning solution (Fig 8).
- 8.3.7 Overall the alterations to the Ground Floor are considered, in line with Table 2, to have a Low Beneficial Magnitude of Impact to the understanding of the historic building i.e. 'a small proportion of the heritage receptor is altered...that results in limited changes'. This is because the change from a private bedroom to a communal kitchen returns the former Drawing Room, with its historic plan intact, to its central and social place within the house.
- 8.3.8 The proposed creation of an en-suite in the rear extension at Bedroom 4, is considered to have No Heritage Impact as the extension is of no heritage value and the scale of the changes is slight.
- 8.3.9 Overall, in line with Table 3, this equates to Minor Beneficial Significance of Effects to the aesthetic understanding and appreciation of the Ground Floor and its dominance within the house as a whole.

First Floor

- 8.3.10 Alterations on the First Floor are almost entirely restricted to the removal of an existing door in Bedroom 5; the reinstatement of a door on the landing and the removal of a non-original partition in bedroom 6 (Figs 5 & 7).
- 8.3.11 None of the proposals have a direct impact upon any historic features or detailing. The removal of the partition at Bedroom 6 will reinstate original flow from the landing. The predicted impacts on this floor are thought to have No Heritage Impact.

Second Floor

- 8.3.12 As described above (5.1.10) the key historic features on this floor are the original door and window architrave in the existing communal kitchen area and in existing Bedroom 7.
- 8.3.13 Alterations proposed on this floor are the removal of non-original walls forming the existing en-suite and bathroom between Bedroom 7 and the kitchen, and the metal stud wall partition of the large Bedroom 7 to convert to two self-contained Units (Figs 5 & 5).
- 8.3.14 The partition in Bedroom 7 has been designed (as with all of the proposed stud walls, see Fig 8), to be reversible, and is positioned centrally between the two front windows in the room. The main focus of alteration is around simplifying the plan around the kitchen and existing bathroom and WC to create separate en-suite closets for the proposed Units 7 & 8. This reduces the confusing five door arrangement from the landing to the existing kitchen and bedrooms to a simpler three-door arrangement. All historic fabric at the kitchen door and the window architrave will be retained.
- 8.3.15 In line with Table 2, it is thought that the simplification of the planform, will have a Negligible Beneficial Magnitude of Impacts on the understanding of the historic planform of the house. There will be No Direct Impact upon the surviving historic features and detailing. Overall, in Line with Table 3 this equates to Not Significant Beneficial Magnitude of Effects to the Second Floor of 109 Guilford Street. In NPPF Terms this is Less Than Substantial Harm.

Third Floor

- 8.3.16 On the third floor, the architectural details are limited and largely replacements, apart from a plain c. late 18th century fire surround in Bedroom 8, which also has a built-in cupboard. Panelling is present in the third-floor stair lobby, which may be original.
- 8.3.17 Proposals for demolition on this floor are restricted to the non-original wall and door in Bedroom 9 (Fig 6). This will allow for the moving of the en-suite to the SE corner of this room, leaving it back-to-back with the en-suite in Bedroom 8 (Fig 7).
- 8.3.18 The scale of the alterations and the retention of the limited historical features results in No Heritage Impact to the Third Floor of 109 Guilford Street.

8.4 Interior Alterations (No. 110 Guilford Street)

Basement

- 8.4.1 As described in Section 5.1.12 above, the basement of No 110 is very similar to that in No. 109, with modern architectural details added, which are of limited, if any historical importance.
- 8.4.2 The proposed alterations at this floor, are with the insertion of en-suite closets between the chimney breasts of the existing Bedroom 1 and the existing kitchen. This will convert the kitchen to a self-contained apartment (Unit 2) and the existing Bedroom 1 will become Unit 1 (Fig 7).
- 8.4.3 The proposals for this the Basement are considered to have No Heritage Impact to any historic features, fabric or details.

Ground Floor

- 8.4.4 Proposals for the Ground Floor of No. 110 Guilford Street comprise a rear extension (described and assessed above) and the conversion of the existing Bedroom 2 to a communal kitchen in exactly the same manner as in No. 109 (Fig 7). Therefore, the assessment of potential harm is the same as for the Ground Floor in No. 109.
- 8.4.5 Overall, in line with Table 3, this equates to Direct Minor to Not Significant Adverse Significance of Effects to the fabric and understanding of 110 Guilford Street. This is Less Than Substantial Harm in NPPF terms.

First Floor

- 8.4.6 No demolitions are proposed for the first floor of No. 110. The only substantive measures proposed for the internal spaces on this floor are for the insertion of 2 x en-suite closets in existing Bedrooms 5 & 6 (Fig 7)
- 8.4.7 It is proposed that this be achieved by the use of a 'room within a room' or pod system. The details of the system are shown in figure 8. In short, the proposed en-suite closets would be located at the partition between existing Bedrooms 5 & 6, so that plumbing and wiring can be shared. It is proposed that the pipes and wiring etc. be routed through the floor and through the void behind the historic curved wall in the Ground Floor, in the same manner as that in No. 109.
- 8.4.8 In the event that a forthcoming survey reveals that the void behind the historic curved wall mentioned above, is inadequate, then provision may need to be made for horizontal and vertical routing to be through the space between the ceiling and floor at the rooms directly below. All routing in this manner would be concealed from view within existing void.
- 8.4.9 The en-suite closets will be encapsulated within a metal stud pod, that will be mounted over the historic floor and away from the fabric of the east wall, and importantly from the historic chimney breast and fireplaces. As with the stud walls, the pods are entirely reversible and a non-permanent addition to the house. The pods will allow for the stated aim of the design for increased living standards within the house, and to accommodate the design without attaching to or physically obscuring any of the key architectural details and features present.
- 8.4.10 It is considered in line with Table 2, that the proposals for the First Floor of No. 110 Guilford Street would have a Negligible Adverse Magnitude of Impact upon the surviving historic fabric of the Ground Floor i.e. 'A barely distinguishable change from baseline conditions', associated with a fully reversible change of layout to an already altered room plan.
- 8.4.11 In line with Table 3, this would equate to a Not Significant Significance of Effects on the historic fabric and planform of the First Floor of No. 100 Guilford Street. In NPPF terms this would be considered Less Than Substantial Harm.

Second Floor

- 8.4.12 The sole demolition for this floor is the proposal to remove the non-original partition wall between the existing Bedroom 7 and the kitchen (Fig 5 & 7).

- 8.4.13 The proposed alterations are for a duplication of the pod system of en-suite as for the First Floor described above and illustrated on figure 8.
- 8.4.14 Finally, it is proposed to insert a reversible metal stud wall to enlarge the existing kitchen (Fig 7). This proposal differs from the previous iteration in that the position of the wall is to respect the symmetry of the south facing front windows, whereas the previous design retained the off-centre position of the existing wall. It is considered that this repositioning of the partition will be a Low Beneficial Magnitude of Impact in Line with Table 2 i.e. 'a detectable impact to the baseline...to a slight degree'. In line with table 3 this will equate to a Minor Direct Beneficial Significance of Effects to the baseline condition of the building, including the treatment of a key historic feature. In NPPF terms this is Less Than Substantial Harm.

Third Floor

- 8.4.15 Historically the Third Floor would not have been fitted with the level of fine detailing and features as the showier Ground Floor and family rooms on the First Floor. This is reflected in on this floor by the absence of any such fine detailing.
- 8.4.16 The proposed demolition for the Third Floor are for the existing partitions and associated modern doors between existing Bedrooms 9 & 10, and existing Bedroom 11 and the bathroom (Fig 6). The proposed alteration is to create two larger apartments (Units 10 & 11) each with their own en-suite closet (Fig 7).
- 8.4.17 It is considered in line with Table 2 that the removal of the partition walls and the opening up of the Third Floor would have a Negligible Beneficial Magnitude of Impacts on the baseline condition of the Third Floor, as it seeks to restore the original proportions to the rooms within.
- 8.4.18 In line with Table 3, this equated to a Not Significant Beneficial Significance of Effects upon the planform and the limited historic features here.

8.5 Other Changes (Both Buildings)

- 8.5.1 It is proposed to replace the existing south facing casement windows in the Mansard Roof, with sash windows similar to those existing elsewhere on Guilford Street.
- 8.5.2 It is considered that such a measure would result in a Negligible Beneficial Magnitude of Impacts in Line with Table 2 on both the Listed Buildings and the setting of the Conservation area. This would equate to a Minor/Not Significant Beneficial Significance of Effects on the setting of the Bloomsbury Conservation Area, in line with Table 3.

8.6 Summary of Impacts

- 8.6.1 The Magnitude of Impacts upon the Regionally Important Grade II Listed 109 – 110 Guilford Street [AB 22] and the Bloomsbury Conservation Area [AB 30] is shown in Table 4 below.

Table 4: Summary of Impacts

Proposal	Direct or Indirect Impact	Significance of Effects	NPPF
----------	---------------------------	-------------------------	------

109 GUILFORD STREET			
Pitched Roof at Basement	Direct and Indirect	Minor and Negligible Beneficial	Benefit
Basement 109	Direct	No Impact	-
Ground Floor 109	Direct	Minor Beneficial	Benefit
First Floor 109	Direct	No Impact	-
Second Floor 109	Direct	Not Sig. Beneficial	Benefit/Neutral
Third Floor 109	Direct	No Impact	-
110 GUILFORD STREET			
Ground Floor Extension 110	Direct and Indirect	Minor Adverse	Less Than Substantial Harm
Extension to WC Closet 110	Direct and Indirect	Minor and Negligible Adverse	Less Than Substantial Harm
Basement 110	Direct	No Impact	-
Ground Floor 110	Direct	Minor/Not Sig. Adverse	Less Than Substantial Harm
First Floor 110	Direct	Not Significant	Less Than Substantial Harm
Second Floor 110	Direct	Minor Beneficial	Benefit
Third Floor 110	Direct	Not Significant Beneficial	Benefit
BOTH BUILDINGS			
Casement Windows	Direct	Negligible Beneficial	Benefit/Neutral
OVERALL SIGNIFICANCE OF EFFECTS			
Conservation Area	Indirect	Minor Adverse	Less Than Substantial Harm
Nos. 109 and 110 Guilford Street	Direct	Minor to Negligible Beneficial	Benefit

Key: Red = Substantial Harm; Amber = Less than Substantial Harm; Green = No Impact / Benefit

9. RECOMMENDATIONS & CONCLUSIONS

9.1 Outline Recommendations

- 9.1.1 A low level Historic Building Recording Survey (for example Level II HBR) is recommended prior to the fitting out of the proposed works on the Ground, First and Second Floors of No. 110 Guilford Street.
- 9.1.2 This would ensure that a record of the condition of the building is made before the partitions and pods are installed and can be used in future to test the efficacy of the reversible design claims of these architectural features.
- 9.1.3 All recommendations are subject to the approval of the from the Local Planning Archaeologist and Conservation Officer, where necessary.

9.2 Conclusions

- 9.2.1 This report was commissioned by Oceanic Jewellers Ltd. It was prepared in response to a revised design for proposals to provide a higher standard of living in the existing student accommodations at 109 & 110 Guilford Street.
- 9.2.2 The report shows that in most cases the proposals have either no impact or a beneficial significance of effect from a heritage point of view.
- 9.2.3 Where harm has been identified e.g. to the rear of 110 Guilford Street, this has been assessed to be Minor at most and within NPPF Less Than Substantial Harm bracket.
- 9.2.4 Overall, from a heritage perspective, AB Heritage is happy to recommend the proposals within this report.

10. REFERENCES

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Appendices

Appendix 1 Cultural Heritage Gazetteer

This gazetteer incorporates all archaeological and historical sites identified on the Greater London HER, and other sources within the 250m study area. Listed Buildings have been included within a 100m study area.

Abbreviations

NGR - National Grid Reference	CA – Conservation Area	LB – Listed Building
HLC - Historic Landscape Character Area	MLO – GLHER monument prefix	ELO – GLHER event prefix
APA - Archaeological Priority Area		

AB No.	Period	Description	Status	NGR	Ref
1	Prehistoric	Findspot of Palaeolithic flints including a handaxe, flakes and scrapers, a Mesolithic tranche axe & a Neolithic polished stone axe, at Gray's Inn Road during the 1880s.		TQ 3080 8230	MLO17696, 97 & 23431
2	Prehistoric	Palaeolithic flint flakes and handaxes were found on Grays Inn Road, during the 1880s.		TQ 3069 8244	MLO46117
3	Roman	Findspot of a copy of a copper alloy coin of Germanicus or Claudius, found in the Fleet ditch at Gouge Street.		TQ 3090 8230	MLO17777
4	Roman - Post-Medieval	London Suburbs Archaeological Priority Area - designated due to the location of Roman occupation and cemeteries along the roads, the extent of which is unclear but may reach as far west as the junction of Bloomsbury Way and New Oxford Street where two Roman roads are thought to have joined.			
	APA	Centred TQ 3063 8165	DLO35589		

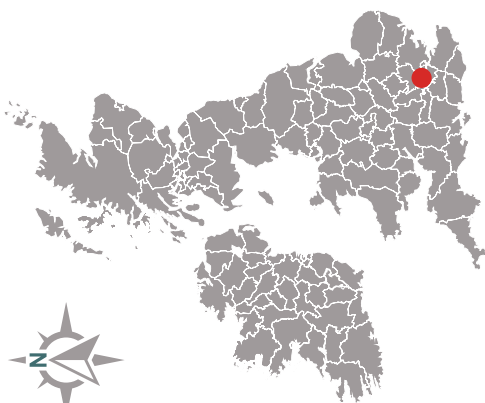
5	Medieval	Exposed masonry wall in the cellars of 49 Doughty Street. The cellar was of brick construction, except for the west wall which was of sandstone. This wall included moulded fragments of grey-green sandstone, possibly Reigate stone. The stone type is compatible with the medieval period, as were the conjectured mouldings. The re-use of medieval stones suggests the contemporary demolition of a large medieval building (location unknown).		TQ 3078 8220	MLO61482
6	Post-Medieval	Civil War defences - projected lengths of rampart and ditch forming the Lines of Communication built 1642-3.			
7	Post-Medieval	An archaeological watching brief and excavation was carried out at 14 Roger Street in 2014. This identified early to mid C17 dumping/ground consolidation were interpreted as backfills for the former Civil War defensive ditch, which were overlain by later C17 to mid C18 dump layers. Finds recovered included a large quantity of medieval and post medieval pottery sherds, a large quantity of clay pipe fragments, animal bone, medieval and post medieval floor and roof tiles, and a small quantity of metal and other small finds.		TQ 3088 8212	ELO14856
8	Post-Medieval - Modern	A watching brief was undertaken on groundworks associated with Thames Water's replacement of water mains in the vicinity of Mount Pleasant, Rosebery Avenue, Farringdon Road and Clerkenwell Road, between 2010 and 2012, identified section of C18 wall (probably associated with the Clerkenwell House of Correction) was recorded on the north-west side of Rosebery Avenue opposite the Mount Pleasant Post Office, and a large well/cistern opposite 6 Topham Street. Several C19 coal cellars were also observed.		Centred TQ 31212 82159	ELO12509
9	Post-Medieval - Modern	An archaeological evaluation was carried out in 1993 at Mount Pleasant Post Office prior to redevelopment of the site. The probable foundations of the Middlesex House of Correction prison building were observed cut into river dumps in the south-western part of the site.		TQ 3104 8238	ELO4061

10	Post-Medieval - Modern	Green area that was originally a burial ground for St Andrew's Holborn since 1754. It closed for burials in 1850 and was opened in 1885 as a public park.		TQ 3076 8237	MLO60004 & 05, 103811, 106616, ELO3505, ELO3512, ELO13072 & ELO14470
11	Post-Medieval - Modern	Coram's Fields with Brunswick and Mecklenburgh Squares - Mid C18 children's gardens, symmetrically flanked by an C18 and an early C19 square, designed to preserve the surroundings of the Coram's Fields gardens for The Foundling Hospital was founded in 1742 and completed in 1826. In 1926 the Hospital sold the whole of its London property and moved out to a new site.	Grade II HP&G	TQ 30496 82277	DLO32915 & MLO59268, 103799 & 107456 & NHLE 1000212
12	Post-Medieval - Modern	49 Gough Street - House & shop, formerly terraced. C19 or earlier. Yellow stock brick with stucco. Exceptionally fine early C19 wooden shopfront.	Grade II LB	TQ 30847 82358	DLO14847, MLO79891 & NHLE 1113045
13	Post-Medieval - Modern	121 Gray's Inn Road and attached railings - Terraced house, formerly with shop. Early 19th century. Stucco.	Grade II LB	TQ 30916 82094	DLO14903, MLO80054 NHLE 1113101
14	Post-Medieval - Modern	141 - 151 and attached railings - Terrace of 6 houses. c1811-20. Darkened stock brick, cast-iron railings with urn finials.	Grade II LB	TQ 30754 82329	DLO14906, MLO80057 & NHLE 1113104
15	Post-Medieval - Modern	139 Gray's Inn Road - House at end of terrace. c1811-20, altered. Multi-coloured stock brick. 3 storeys, attic and basement.	Grade II LB	TQ 30772 82306	DLO14905, MLO80056 & NHLE 1113103

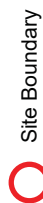
16	Post-Medieval - Modern	11 - 26 Mecklenburgh Square and attached railings - Terrace of 24 houses forming the east side of Mecklenburgh Square. Various architects. Mostly early C19, 15 and 27-34 rebuilt in facsimile c1950. Formal composition of 4 storeys with basements. Attached cast-iron railings with urn finials. 21 was the residence of RH Tawney, historian, teacher & political writer.	Grade II* LB	TQ 30675 82415	DLO14920, MLO80071 & NLHE 1113118
17	Post-Medieval - Modern	165 Gray's Inn Road and attached railings - Terraced house. c1811-20, re-fronted late 20th century. Multi-coloured stock brick with plain stucco. 3 storeys and basement.	Grade II LB	TQ 30728 82362	DLO14928, MLO80079 & NHLE 1113126
18	Post-Medieval - Modern	240, 242 & 244-250 Gray's Inn Road - terraces houses with later shops. Early C19. Yellow stock brick, largely refaced. 4 storeys and basement. Calthorpe Arms Public House - End of terrace public house. Early C19. Yellow stock brick. 4 storeys and cellar. Early C20 interior.	Grade II LB	TQ 30806 82309	DLO14929 - 32, MLO80080-3 & NHLE 1113127- 30
19	Post-Medieval - Modern	2 - 9 Wren Street - Terrace of 8 houses. c1824-30. Darkened yellow stock brick. 3 storeys, attics (Nos 2-5) and basements. Cast-iron railings with urn finials.	Grade II LB	TQ 30799 82348	DLO16332, MLO81378 & NHLE 1379212
20	Post-Medieval - Modern	1 - 21 Calthorpe Street & attached railings - Terrace of 21 houses. c1821-6. Yellow stock brick. 4 storeys and basements. Cast-iron railings with urn finials.	Grade II LB	TQ 30818 82317	DLO15206, MLO80370 & NHLE 1244304
21	Post-Medieval - Modern	2 - 24 Calthorpe Street & attached railings -(includes 238A & B Gray's Inn Road) - Terrace of 12 houses. c1820-1826. Built by N Stallwood. 4 storeys and basements. Cast-iron railings with urn finials.	Grade II LB	TQ 30848 82303	DLO15207, MLO80371 & NHLE 1244306
22	Post-Medieval - Modern	105 -110 Guilford Street & attached railings - Terrace of 6 houses. c1792-1800. By James Burton. 3 storeys, attics and basements. Nos 108-110, stone cornices and blocking courses. Cast-iron railings with urn finials.	Grade II LB	TQ 30770 82290	DLO15404, MLO80568 & NHLE 1271623
23	Post-Medieval - Modern	2 bollards flanking the entrance to Brownlow Mews - 2 bollards with spur stones. C19. Cast-iron of cannon type. Westernmost bollard inscribed "Doughty Estate".	Grade II LB	TQ 30789 82273	DLO15801, MLO80965 & NHLE 1378646

24	Post-Medieval - Modern	3 - 7 Guilford Street & attached railings - Terrace of 5 houses. c1792-1800. Darkened yellow stock brick. Cast-iron railings with urn finials.	Grade II LB	TQ 30759 82255	DLO15311, MLO80475 & NHLE 1245854
25	Post-Medieval - Modern	Bollard at the junction with Dougherty Street - Bollard. C19. Cast-iron of cannon type. Inscribed "Foundling Hospital" and with a relief of a lamb.	Grade II LB	TQ 30733 82266	DLO15405, MLO80569 & NHLE 1271624
26	Post-Medieval - Modern	Charles Dickens House & attached railings - Terraced house. c1807-9. Darkened stock brick with slate mansard roof and dormer. Original lead rainwater head and pipe. This house was between 1837 and 1839 the home of Charles Dickens.	Grade I	TQ 30782 82203	DLO15730, MLO80894 & NHLE 1356735
27	Post-Medieval - Modern	8, 9 & 10 Guilford Street & attached railings - Terrace of 4 houses. c1792-1800, altered. 3 storeys, attic and basements. Cast-iron railings with urn finials to areas of Nos 9 and 10.	Grade II LB	TQ 30706 82232	DLO15312, MLO80476 & NHLE 1245855
28	Post-Medieval - Modern	Great Ormond Street Children's Hospital - England's first children's hospital established in 1851 in a rented house. A purpose-built pavilion plan style hospital was erected between 1872-7 to designs by E M Barry. This was much extended in later years. Hospital chapel built in 1876 to designs by Edward Barry. Built in a flamboyant High Victorian style. Interior decoration and stained glass by Clayton and Bell. In the early 1990s the chapel was moved to the modern hospital and restored.		TQ 3048 8206	TQ 38 SW 1449 & TQ 38 SW 1450
29	Post-Medieval - Modern	29 - 38 Dougherty Street & attached railings - Terrace of 10 houses. 1794-1810. Built by G Slaton and G Golden. Darkened multi-coloured stock brick. Cast-iron railings with urn finials. 3 storeys, attics and basements.	Grade II LB	TQ 30728 82295	DLO15728, MLO80892 & NHLE 1356733

30	Post-Medieval - Modern	Bloomsbury Conservation Area - covers an area of approximately 160 hectares, Bloomsbury is widely considered to be an internationally significant example of town planning. Its expansion northwards from roughly 1660 to 1840 has led to a notable consistency in the street pattern, spatial character and predominant building forms. The initial designation of Bloomsbury as a conservation area in 1968 sought to protect elements of development from the Georgian and earlier eras, but excluded areas where there had been significant later redevelopment.	CA		DLO36489
31	Modern	London House - London House was established in 1931 by FC Goodenough - who raised the funds with which to found the Dominion Students' Hall Trust - as a place where students from the British Empire could live a collegiate life. One of Sir Herbert Baker's most characteristic later buildings. The post-war northern and western ranges were completed to a simplified design after Baker's death in 1944.	Grade II LB	TQ 30637 82266	DLO14923, MLO80074 & NHLE 1113121
32	Modern	Royal Free Hospital Auxiliary Hospital - The newly built but as yet unoccupied Helena Building which was part of the Royal Free Hospital, was requisitioned in 1915 by the War Office before it could open, for use as an auxiliary hospital. In 1918, after demobilisation, it was returned to the hospital.		TQ 30795 82514	MLO107270
33	Modern	The ITN Building - Foster and Partners first major commercial building in London was built from 1989 to 1992 for Stanhope Properties and taken over by ITN, Independent Television News. Constructed on a site which was formerly occupied by 'The Times', it is a deep-plan atrium building with glass and aluminum curtain-walling. The building has now become synonymous with the image of ITN, forming the backdrop for the news broadcasts.		TQ 3092 8217	TQ 38 SW 1780



KEY



Site Boundary



Figure 1: Site Location

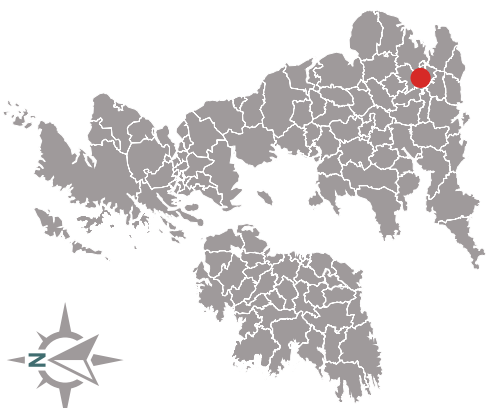
Project: 109-110 Guilford Street

Date: 28/03/17 Job No: 10697

Drawn by: PL

Approved by: KKP





KEY

- Site Boundary
- Search Areas (100m & 250m)
- Listed Building
- AB Numbers
- Historic Parks & Gardens (AB 11)
- London Suburbs APA (AB 4)
- Bloomsbury Conservation Area (AB 30)
- Projected Line of Civil War Fortifications (AB 6)

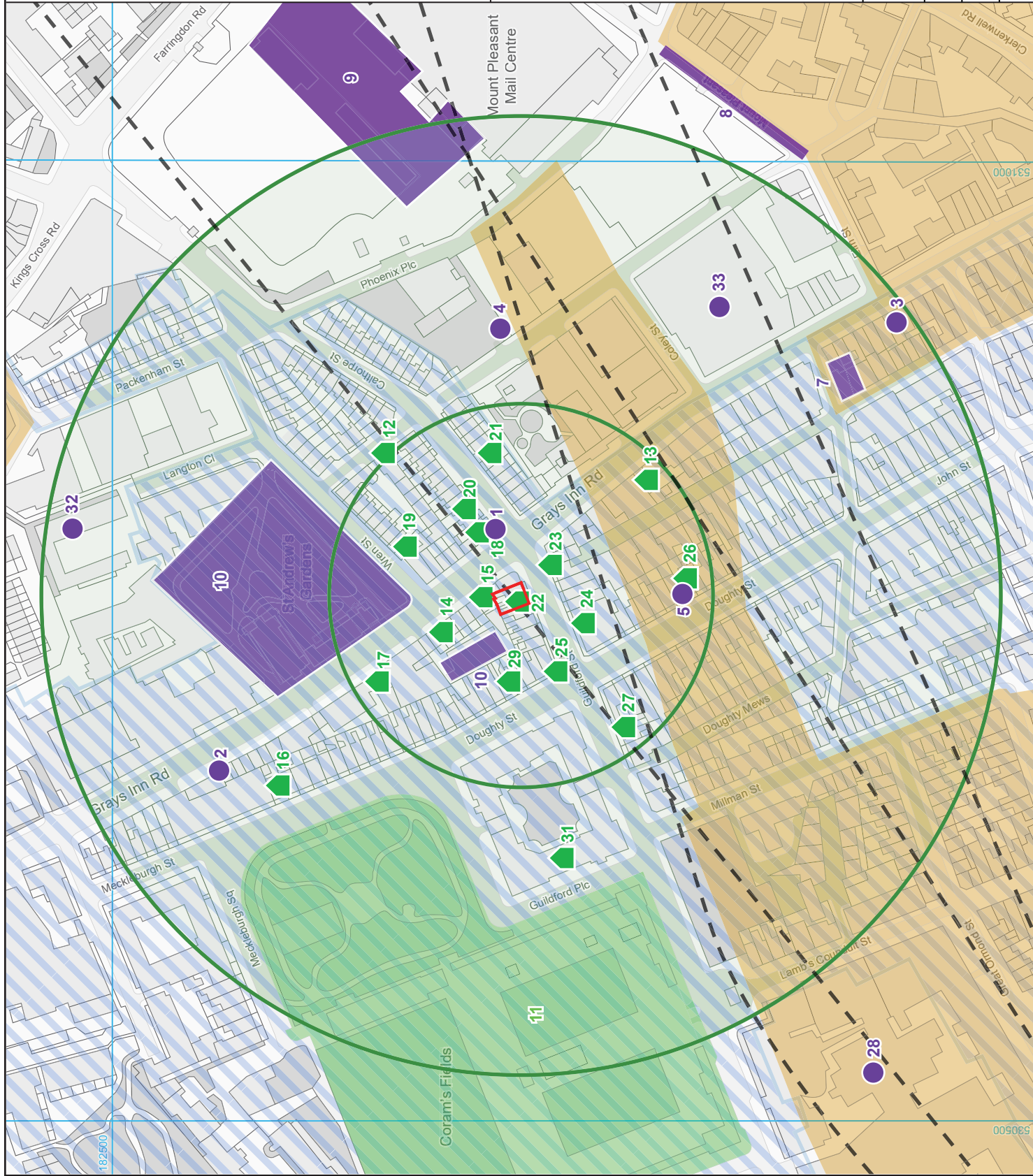


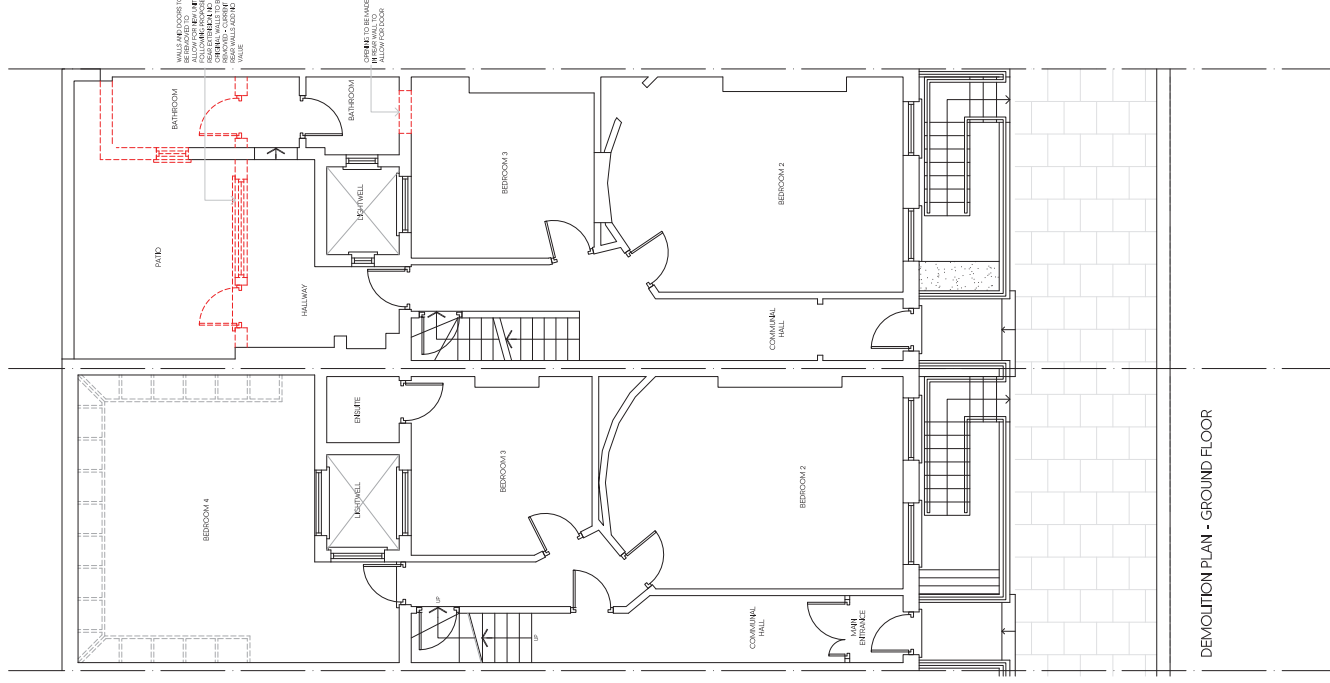
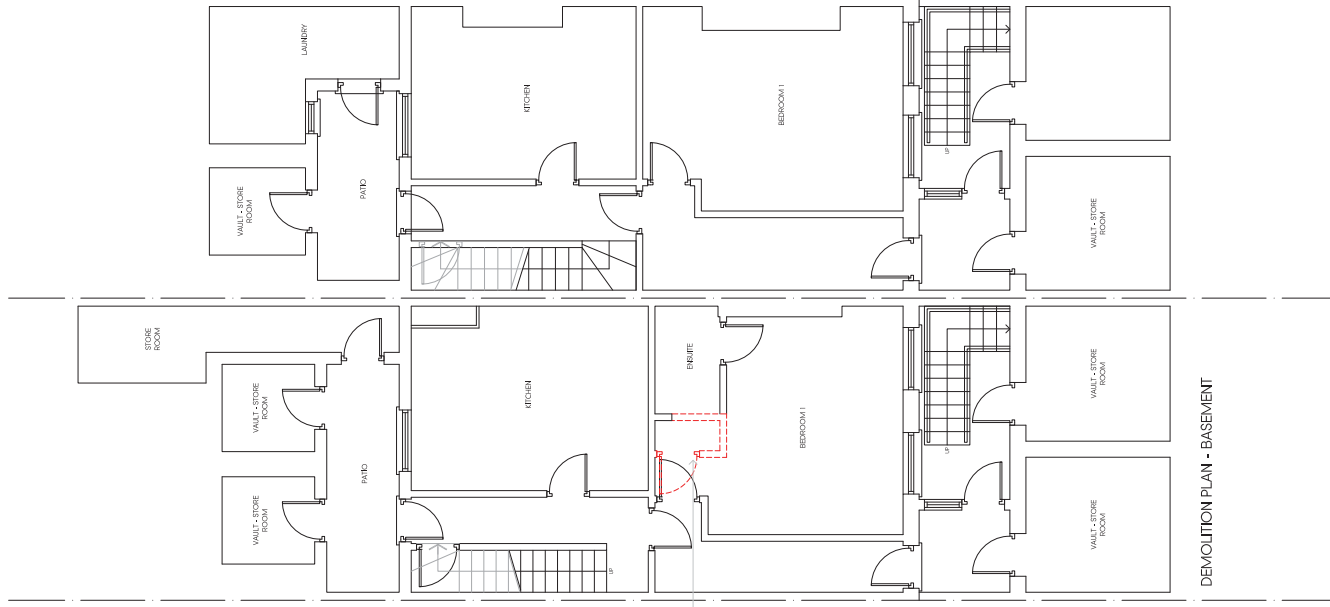
Figure 2: Map of Cultural Heritage Features

Project: 109-110 Guilford Street

Date: 28/03/17 Job No: 10697

Drawn by: PL Approved by: KKP





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Row	Date	Description	Init.

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109-110 GUILFORD STREET, LONDON, WC1

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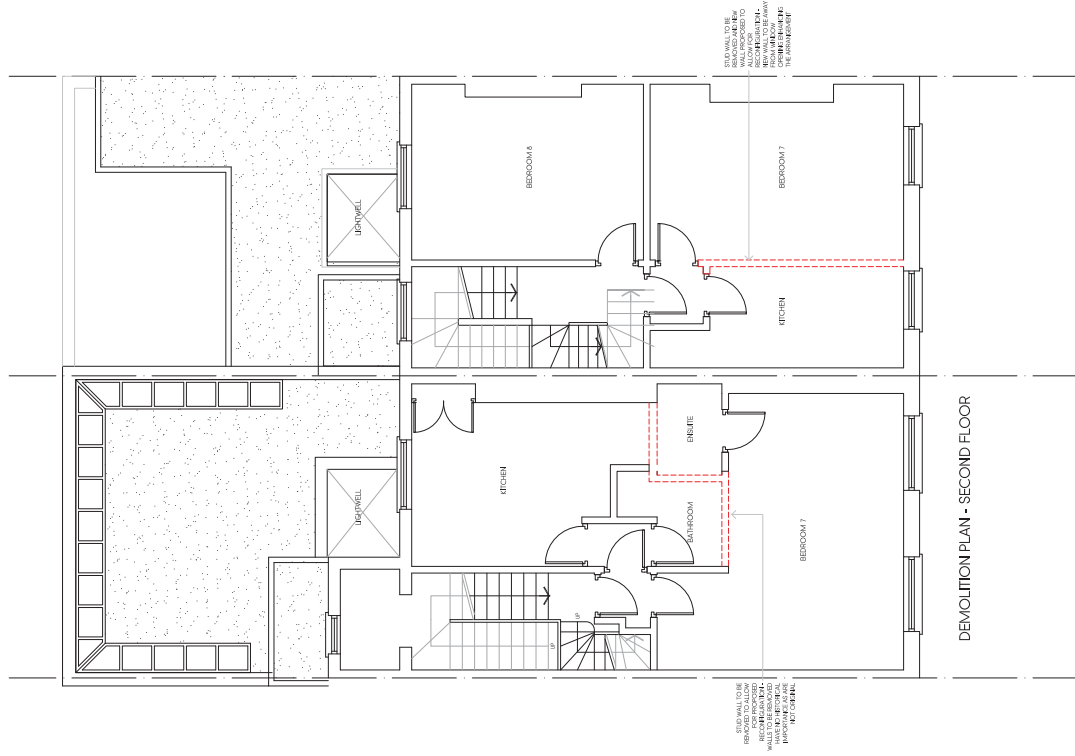
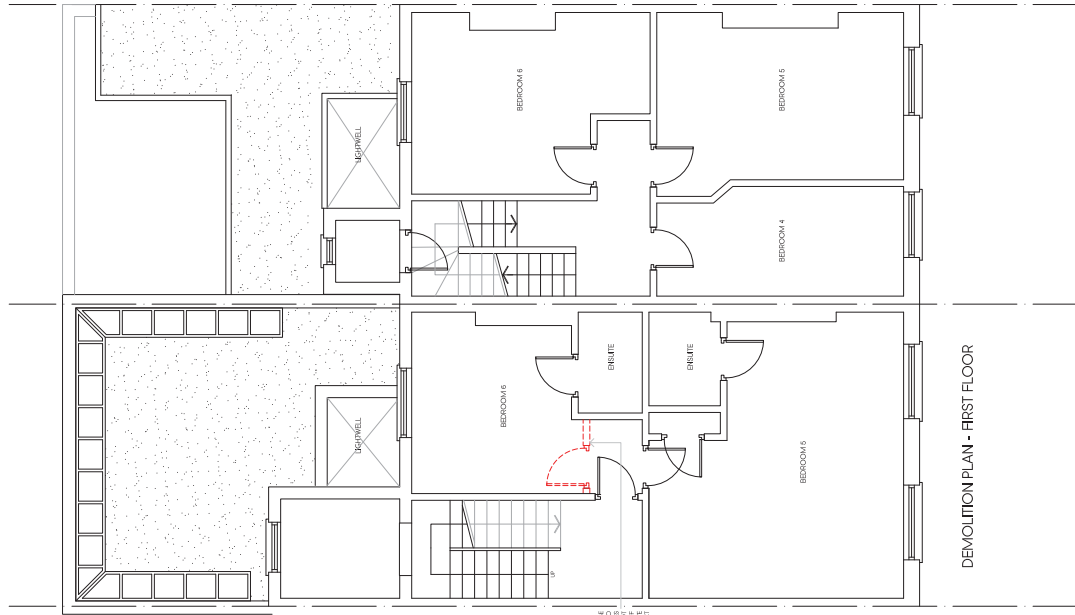
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Project No.	Drawing No.	Revision
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Rev	Date	Description	Init.

OCEANIC JEWELLERS

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DEMOLITION PLAN - FIRST & SECOND FLOOR

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Drawn by	Drawing Date	Approved by
BR	MAR 2018	NJ
Project No.	Drawing No.	Revision
1565	P302	-



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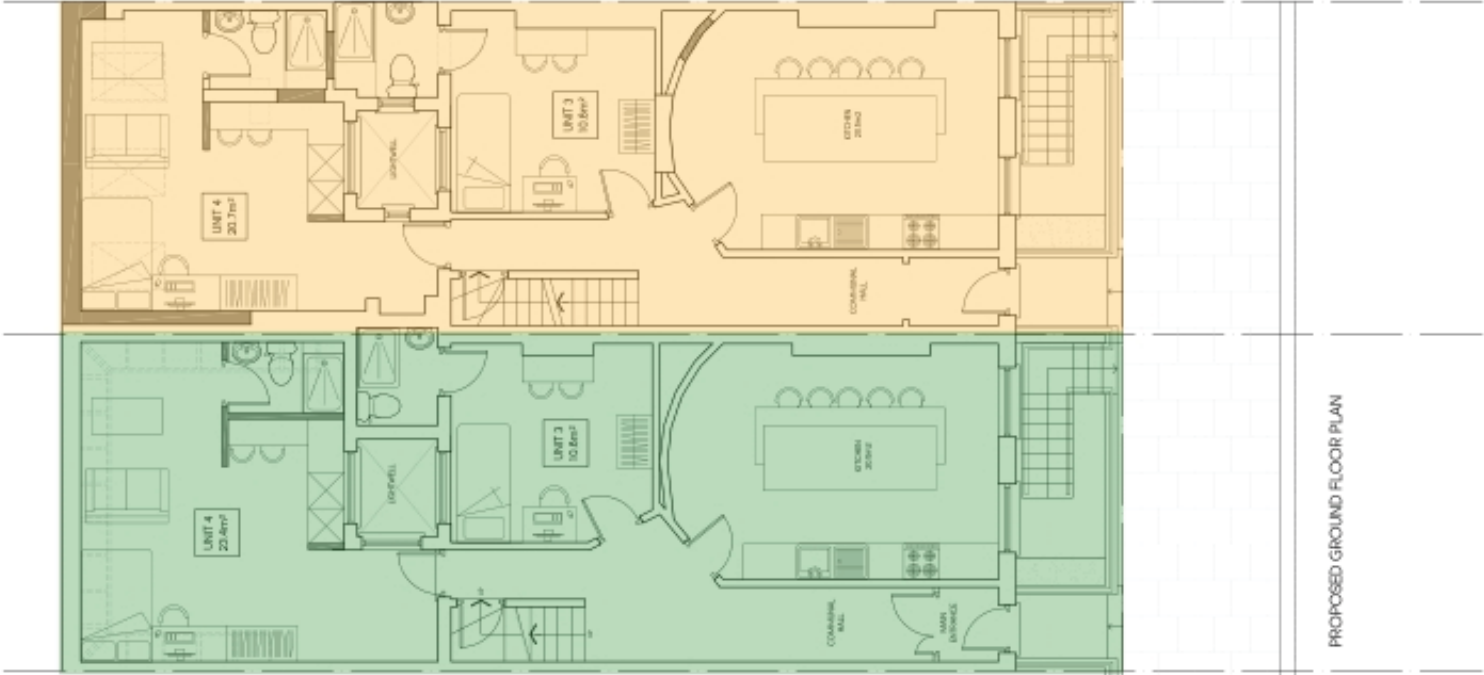


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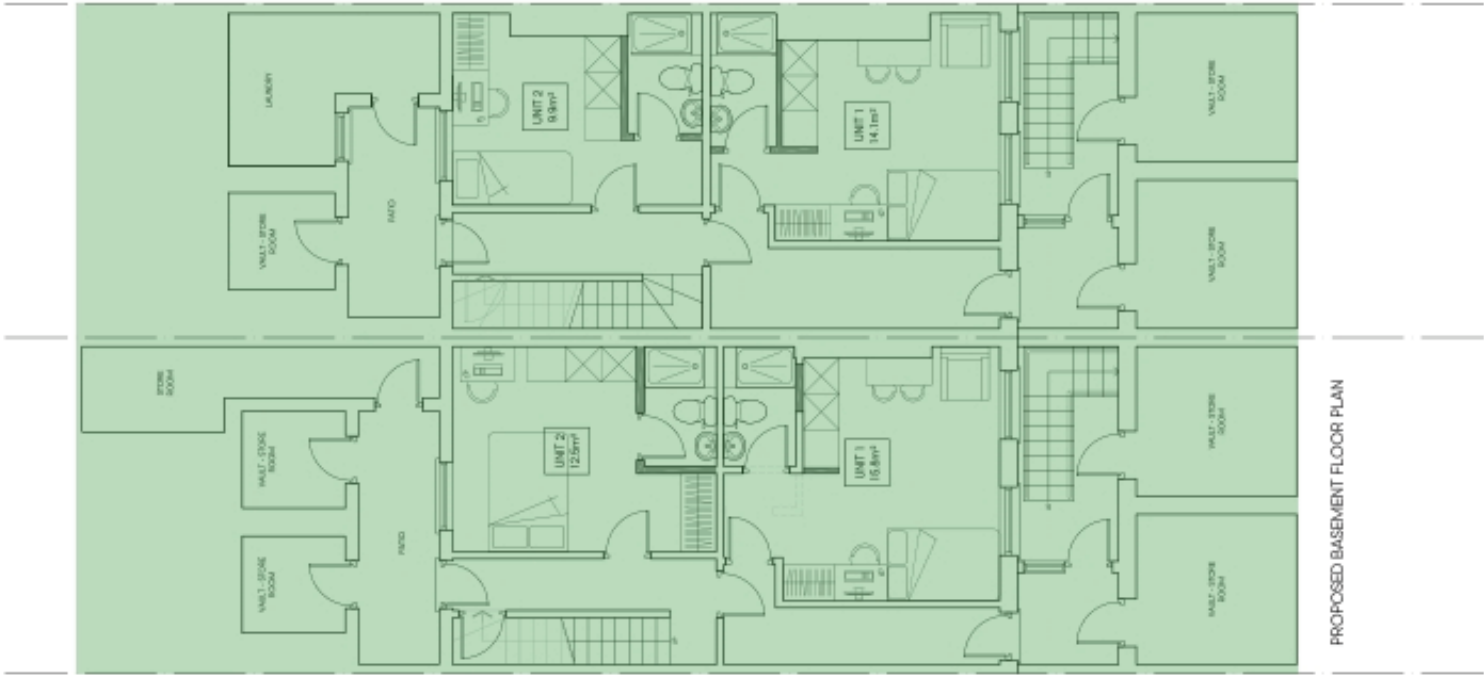


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PROPOSED GROUND FLOOR PLAN



PROPOSED BASEMENT FLOOR PLAN

Key:
Red = Substantial Harm;
Amber = Less than Substantial Harm;
Green = No Impact / Benefit

Ref	Date	Description	Ref
A	12/04/18	AMENDED TO SET CURB CORNERPOSTS	BR
B			
C			

OS/SANIC, R/MELLER

Project Title:
PACKAGED EXTENSION & INTERNAL ALTERATIONS
100-110 OULFORD STREET, LONDON, WCT

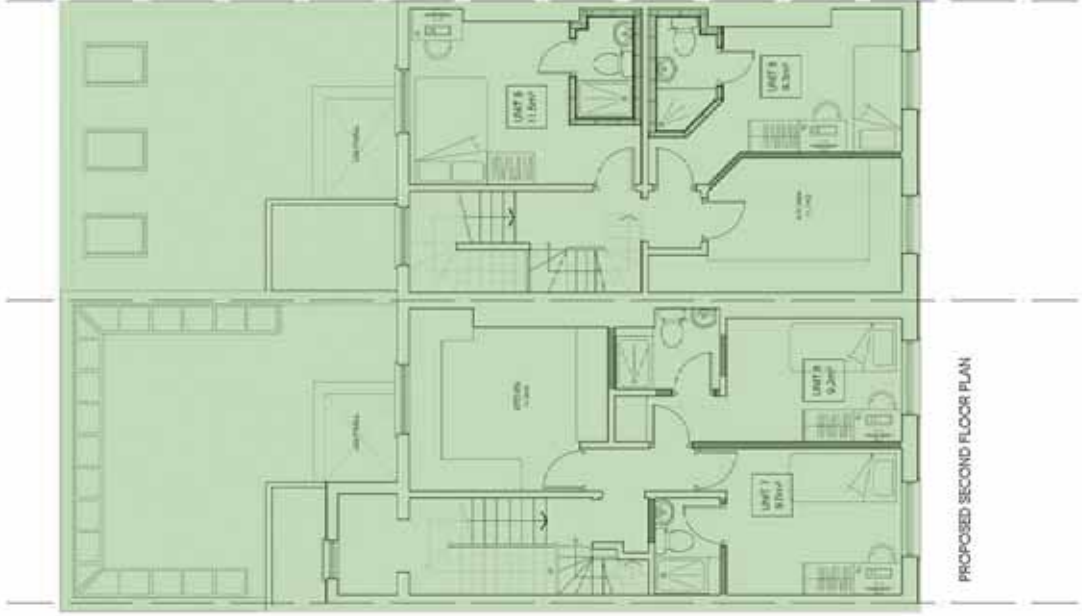
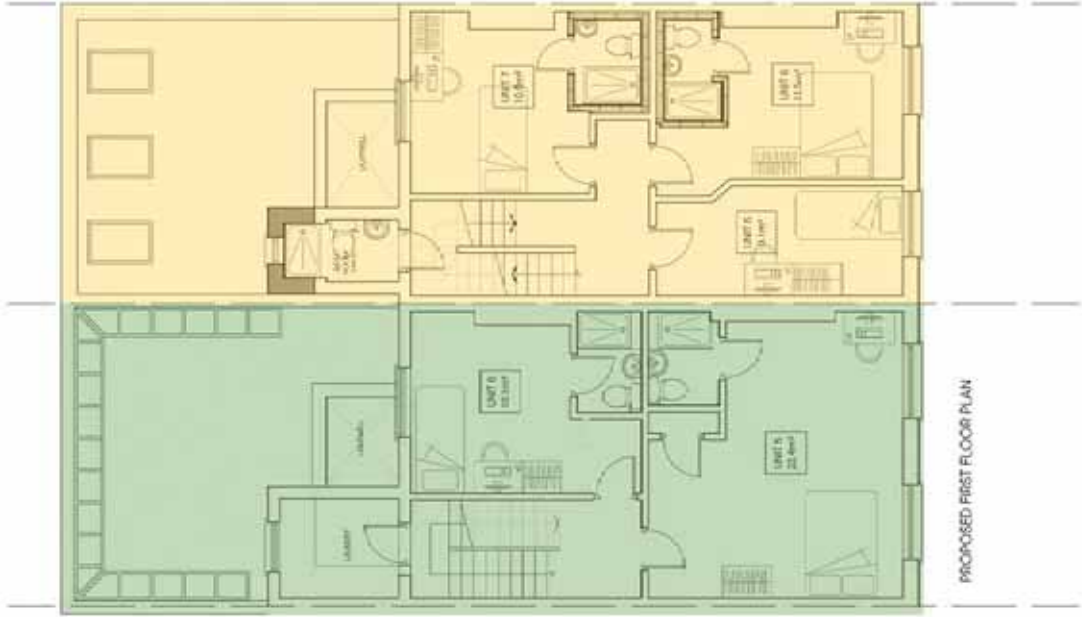
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Project No	100-110 OULFORD STREET	1:50
Drawing No	P004	A

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Key:
 Red = Substantial Harm,
 Amber = Less than Substantial Harm,
 Green = No Impact / Benefit

Ref	Issue	Impact	Significance
1	Visual Impact	Low	Low
2	Access	Low	Low

Project Info
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 101-115 GAIL STREET, LONDON, W11
 Planning Ref: 1666

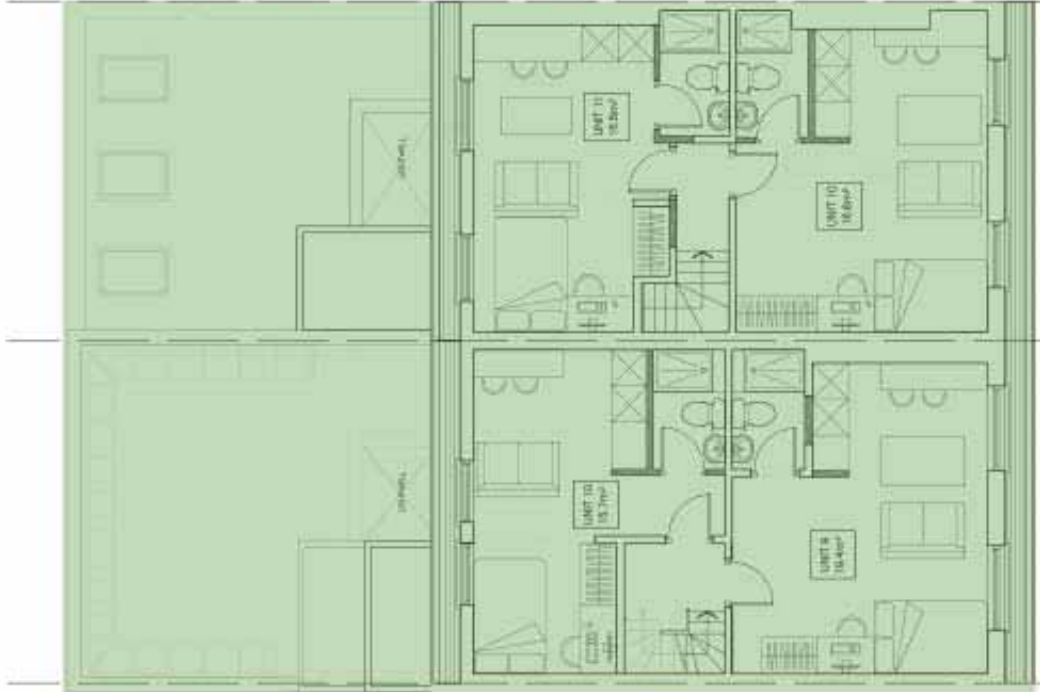
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4	Visual Impact	Low	Low
5	Access	Low	Low
6	Visual Impact	Low	Low
7	Access	Low	Low
8	Visual Impact	Low	Low
9	Access	Low	Low
10	Visual Impact	Low	Low
11	Access	Low	Low
12	Visual Impact	Low	Low
13	Access	Low	Low
14	Visual Impact	Low	Low
15	Access	Low	Low
16	Visual Impact	Low	Low
17	Access	Low	Low
18	Visual Impact	Low	Low
19	Access	Low	Low
20	Visual Impact	Low	Low

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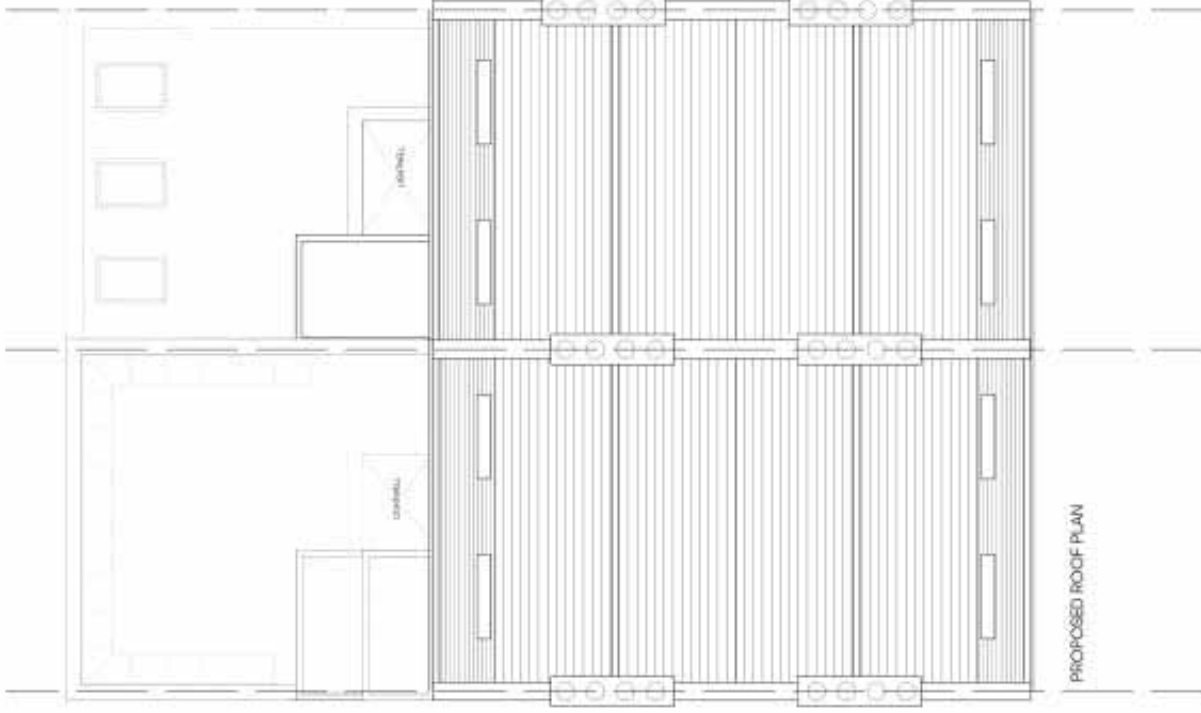
This planning application is submitted under the provisions of the Town and Country Planning Act 1990 and the Town and Country Planning Regulations 1988. It is submitted in accordance with the provisions of the Town and Country Planning Act 1990 and the Town and Country Planning Regulations 1988. The planning application is submitted in accordance with the provisions of the Town and Country Planning Act 1990 and the Town and Country Planning Regulations 1988.

PLANNING ISSUE

NOTES: 1. ALL WORK TO BE COMPLETED BY 15/03/2025. 2. ALL WORK TO BE COMPLETED BY 15/03/2025. 3. ALL WORK TO BE COMPLETED BY 15/03/2025.



PROPOSED THIRD FLOOR PLAN



PROPOSED ROOF PLAN

Key:
Red = Substantial Harm;
Amber = Less than Substantial Harm;
Green = No Impact / Benefit

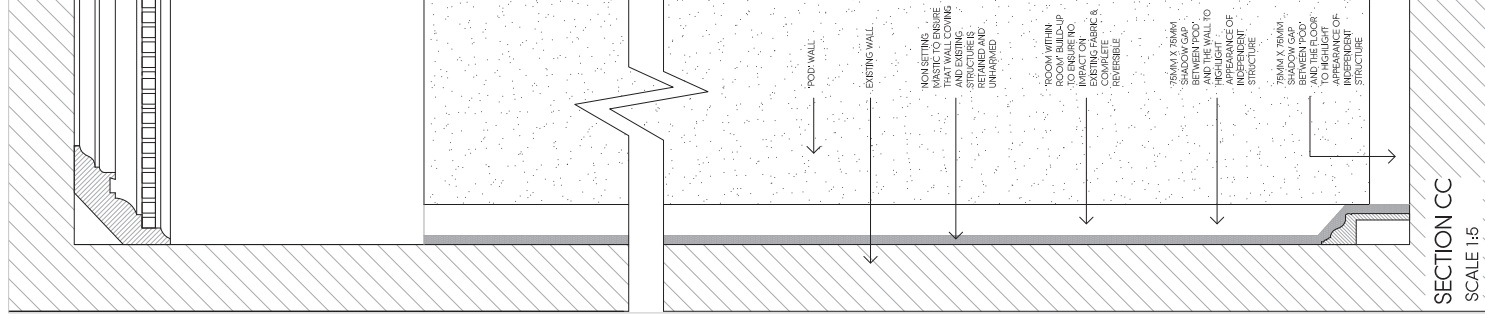
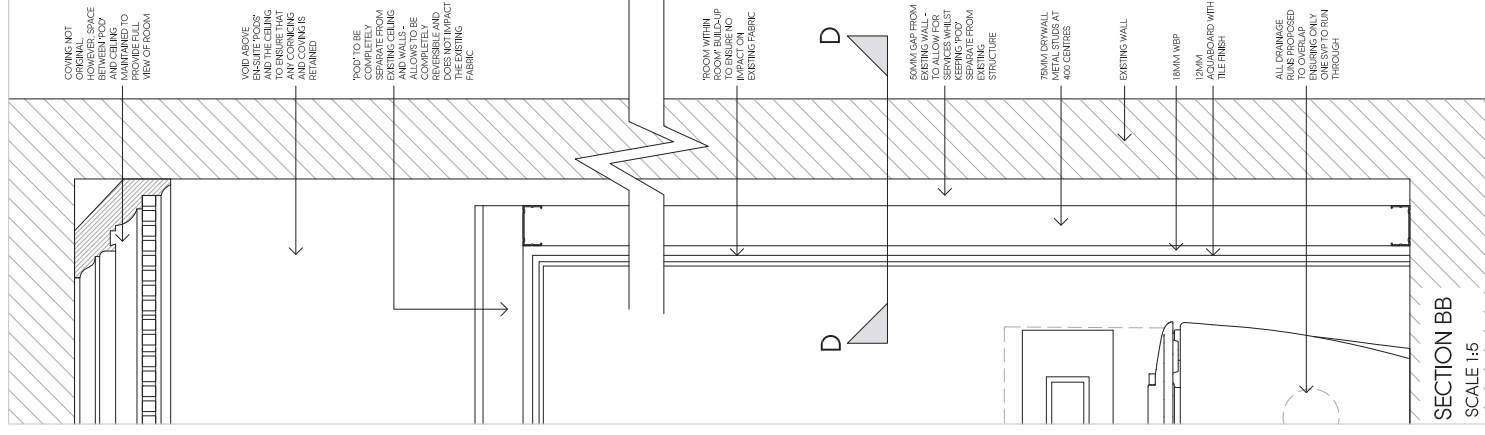
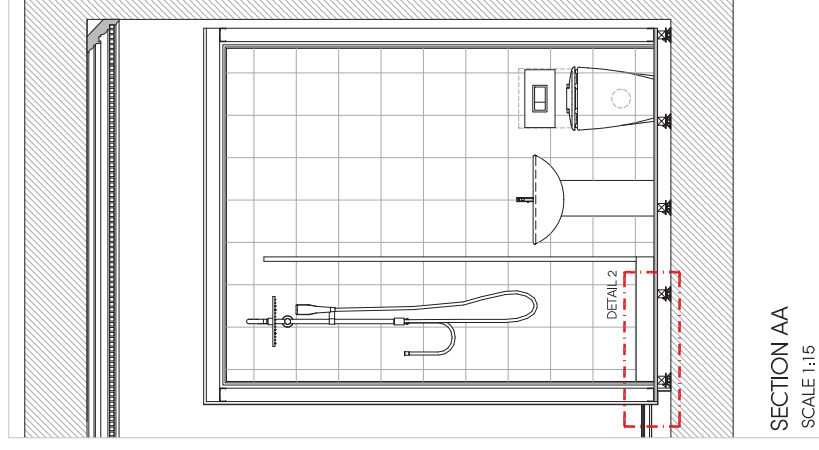
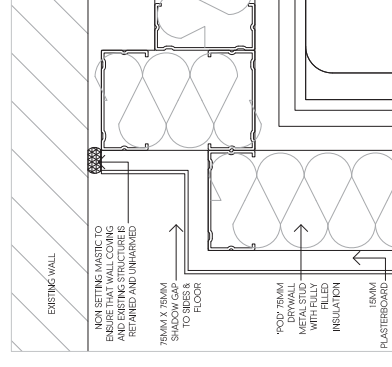
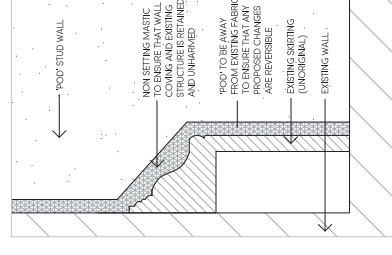
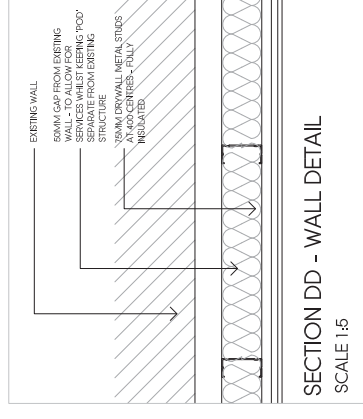
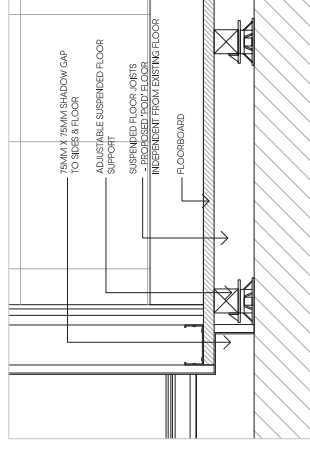
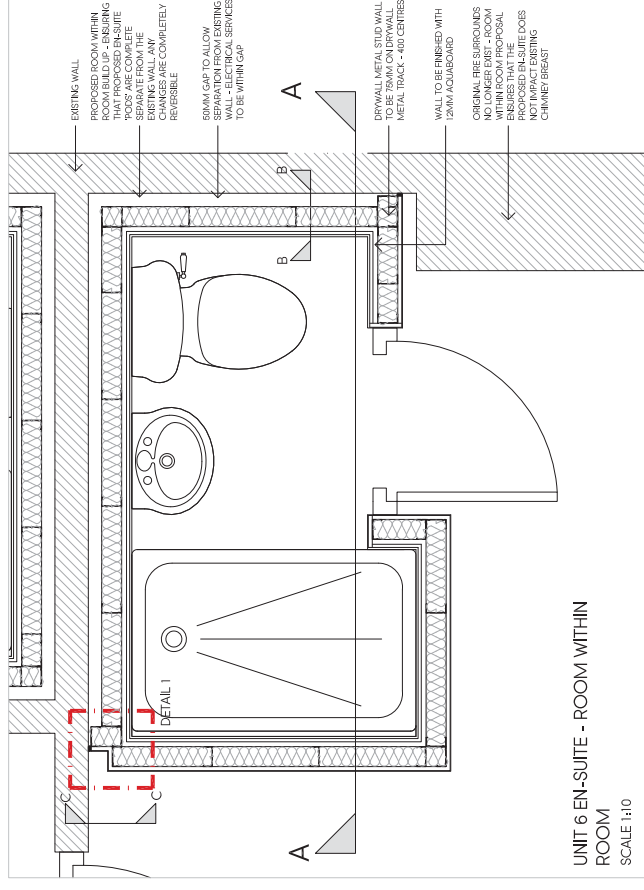
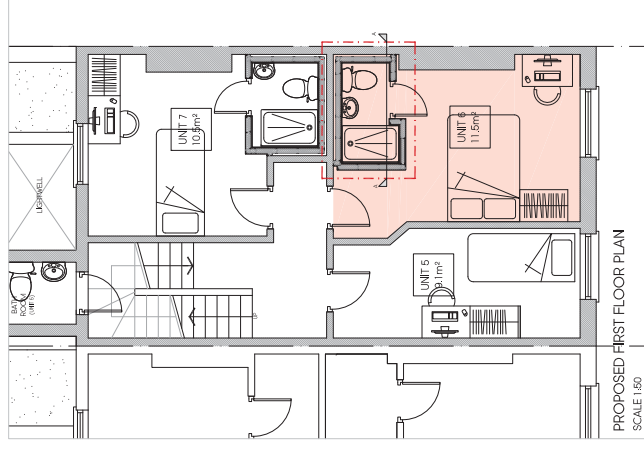
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PROPOSED EXTENSION & INTERNAL ALTERATIONS
(100-110 LUDLOW STREET, LONDON, WC1E 6JF)

Project No.	100-110
Client	100-110
Design No.	100-110
Project No.	100-110
Project No.	100-110

Jutla Architects

Not a drawing to be used for construction purposes. It is a planning application drawing. It is not a contract document. It is a planning application drawing. It is not a contract document. It is a planning application drawing. It is not a contract document.



A	12/04/18	AMENDED TO SAT CLIENT COMMENTS	BR
Rev	Date	Description	Init.

OCEANIC JEWELLERY

Project Title
PROPOSED EXTENSION & INTERNAL ALTERATION
109-110 GUILFORD STREET, LONDON, WC1

Drawing Time

110 GUILFORD STREET - UNIT 6 DETAILS	Sheet Size	Scale
Card File	A1	AS SHOWN
P004	Drawn by	Approved by
BR	MAK 2018	NJ
Project No.	Drawing No.	Revision
1565	P601	A



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PLANNING ISSUE



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