



Historic England

LONDON OFFICE

Ms Catherine Bond  
London Borough of Camden  
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Direct Dial: 07990 339977

Our ref: L01016354

23 January 2019

Dear Ms Bond

**Arrangements for Handling Heritage Applications Direction 2015**

**23-24 MONTAGUE STREET LONDON WC1B 5BH  
Application No. 2018/4886/L**

Thank you for your letter of 2 January 2019 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your Authority in determining the application.

**Historic England Advice**

The application site forms part of a Grade II listed terrace on the east side of Montague Street, built c.1803-6 for the Duke of Bedford by his builder James Burton. Along with Bedford Place to the east, the terraces are described in the *Buildings of England* series as 'characteristic and perfectly preserved examples of the style of the Duke of Bedford's new developments of this time'. Despite some later subdivision and lateral conversion, numbers 23-24 generally retain their internal historic plan form and significant internal features including staircases and chimneybreasts. These features reflect the buildings' typology, domestic function, and period and are integral to the understanding of the historic and aesthetic values that underpin the overall significance of the building, as reflected in its Grade II listed status.

The application documents include a set of historic plans of the buildings dating to c.1933 which show a different staircase configuration at second to third floor levels compared to the existing arrangement. It is not, however, clear (as acknowledged within the Heritage Statement) whether these plans are accurate. The accompanying photographs illustrate that the joinery is of a high quality of design and craftsmanship with surviving balustrades, newel posts, and hand-rails (the treads and risers are obscured underneath the existing carpet) and it is likely that the staircase is original.

The proposals involve demolition of the existing staircase between second and third floor levels, and the construction of a new staircase in a different configuration. The justification provided is that the alterations granted previously (ref: 2017/0044/L) for the



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conversion of the existing hotel to flats, which retained the staircase, do not comply with Building Regulations requirements due to insufficient room outside the entrance door to safely enter and leave the unit, resulting in a trip/falling hazard. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires your authority to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Paragraph 193 of the National Planning Policy Framework (NPPF) states 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' irrespective of the degree of harm caused. Paragraph 194 requires any harm to be clearly and convincingly justified.

In our view, the proposed demolition and relocation of the existing staircase would cause harm to the significance of this Grade II listed building as a result of the total loss of a significant internal architectural feature, which we do not consider to be justified. We therefore do not consider the proposals to meet the requirements of NPPF policy. There are many instances where existing historic staircases do not comply with Building Regulations and there may be other ways of improving safety arrangements without the need for demolition of the existing staircase. We recommend that alternative options for the layout of residential units are explored.

**Recommendation**

Historic England has concerns regarding the application on heritage grounds. We would welcome the opportunity of advising further as the implications of this application are significant and we are at present unable to authorise or direct as to the granting of listed building consent, which is required in order for your Authority to grant consent. We therefore recommend that this application is refused, amended or withdrawn. Please contact us again if any additional information or amendments are submitted.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the Local Planning Authority. The full GLAAS consultation criteria are on our webpage at the following link: <https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



**Sarah Freeman**

Inspector of Historic Buildings and Areas

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