

**No. 20 Theobalds Road
London WC1X 8PF**

HERITAGE and DESIGN & ACCESS STATEMENT:
Significance, Impact Assessment and Justification Statement
(Grade II Listed Building in a Conservation Area)



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Prepared for:
Fernglen Properties Limited

20 Theobalds Road: Heritage AND Design & Access Statement

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Aim of this report

This Heritage and DAS Statement has been produced to support an application for listed building consent and planning permission for 'Conversion and alteration of a HMO (Class C4) property to create 4no 1-bedroom self-contained flats at lower, ground, 1st and 2nd floor levels and 1no 2-bedroom unit on the 3rd floor level (Class C3) and associated repairs/refurbishment to the building's façade and interiors (variation to scheme approved under refs. 2018/5286/P and 2018/5565/L).' ~~'Internal and external refurbishment of the Listed Building, including the reinstatement of historic features and removal of modern partitioning, to provide three one-bedroom residential units and one three-bedroom residential unit.'~~

Following approval of the full applications refs. 2018/5286/P and 2018/5565/L (March 2019) for 'Conversion of a HMO (Class C4) property to create 3no 1-bedroom self-contained flats at lower, ground and 1st floor levels and a 3-bedroom self-contained maisonette (Class C3) at 2nd and 3rd floor level and associated repairs/refurbishment to the building's facade.' the proposed variations to the works as granted that form part of the current application have arisen through re-examining the previously consented scheme and undertaking further research and design development. It is considered the 3-bed family unit is not very practical being located on the second and third floor, so the residential mix has been revised and adjusted to better suit the building and the future residents.

The condition 4 of listed building consent 2018/5565/L has also been discharged in August 2019 and works on site have commenced. The proposed scheme maintains and complements the consented scheme refs. 2018/5286/P and 2018/5565/L. Furthermore, the application for 'Removal of ceiling joists at 3rd floor level and associated work' (ref 2019/3767/L) has been granted in November 2019.

Fernglen (the Applicant) has recently acquired 20 Theobald's Road. It has also acquired the wider terrace from 12 to 22, which is now under single ownership for the first time. Fernglen has been working with officers since the acquisition, in exploring the sensitive refurbishment of all of these properties as they have been the subject of unsympathetic and in some cases, unauthorised alteration and use in the past. The basis for the multiple purchase of these buildings is to retain them in a single long-term development and ownership within the community.

The proposed scheme consists of a number of minor internal and external alterations with minimal interference with the historic building fabric. This statement and the documents attached herein follow the same format as the extant consent for similar proposals at No22 Theobalds Road (ref. numbers 2016/2284/P and 2016/3278/L, granted on 14/06/2016).

The purpose of this Heritage Statement is to demonstrate how the proposed scheme complies with the requirements of the Revised NPPF-National Planning Policy Framework, the NPPG – National Planning Practice Guidance and the local policies - in respect of Heritage issues.

This Heritage and Design & Access Statement is to be read alongside the Planning statement by Daniel Watney (~~November 2019 October 2018~~), Daylight and Sunlight Report by TFT (October 2018), Heating and Hot Water Strategy Report by MWL (October 2018) and the design drawings by Thirdway Architecture Heritage Architecture [SLHA] (November 2019 October 2018).

Introduction and setting

No 20 is a part of the terrace of No's 12-22 Theobalds Road, London WC1X, which is a Grade II listed terrace and within the Bloomsbury Conservation Area, London Borough of Camden (Figures 1 and 2).

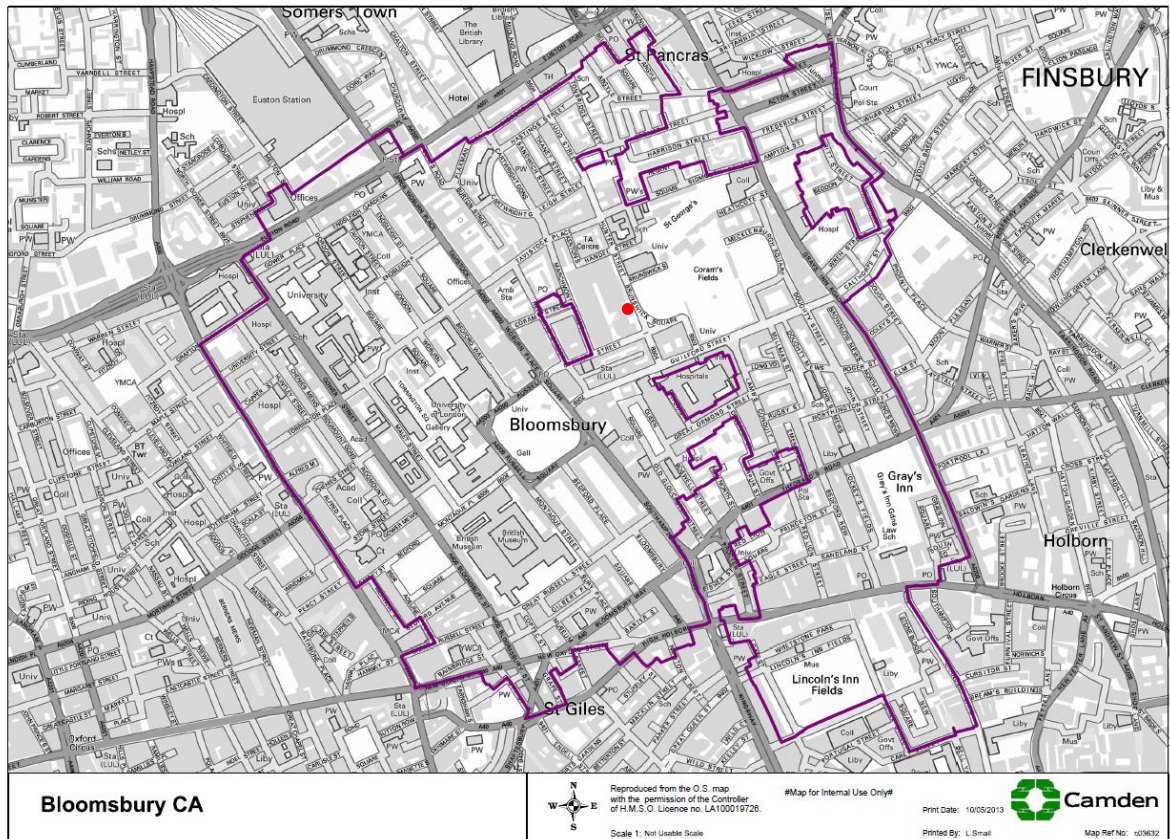


Figure 1: Bloomsbury Conservation Area Map (source: Bloomsbury Conservation Area Appraisal and Management Strategy Adopted 2011) (subject site highlighted in red)

Theobald's Road is a major east-west thoroughfare which was widened in 1877-78. On the north side of the street, Nos 12-32 (even) Theobald's Road encloses the north side of Gray's Inn Gardens.

Over time the majority of the residential townhouses were converted to other uses, in particular as offices. The properties have indeed been altered and modified over time, but not so extensively as to erode their heritage significance. Majority of the alterations and changes are interior and at the back externally. From the public realm they still appear to preserve their most significant historic features, character and appearance (Figure 8). A progression of historic maps in Appendix 2 illustrates the area's development.

Statutory Site

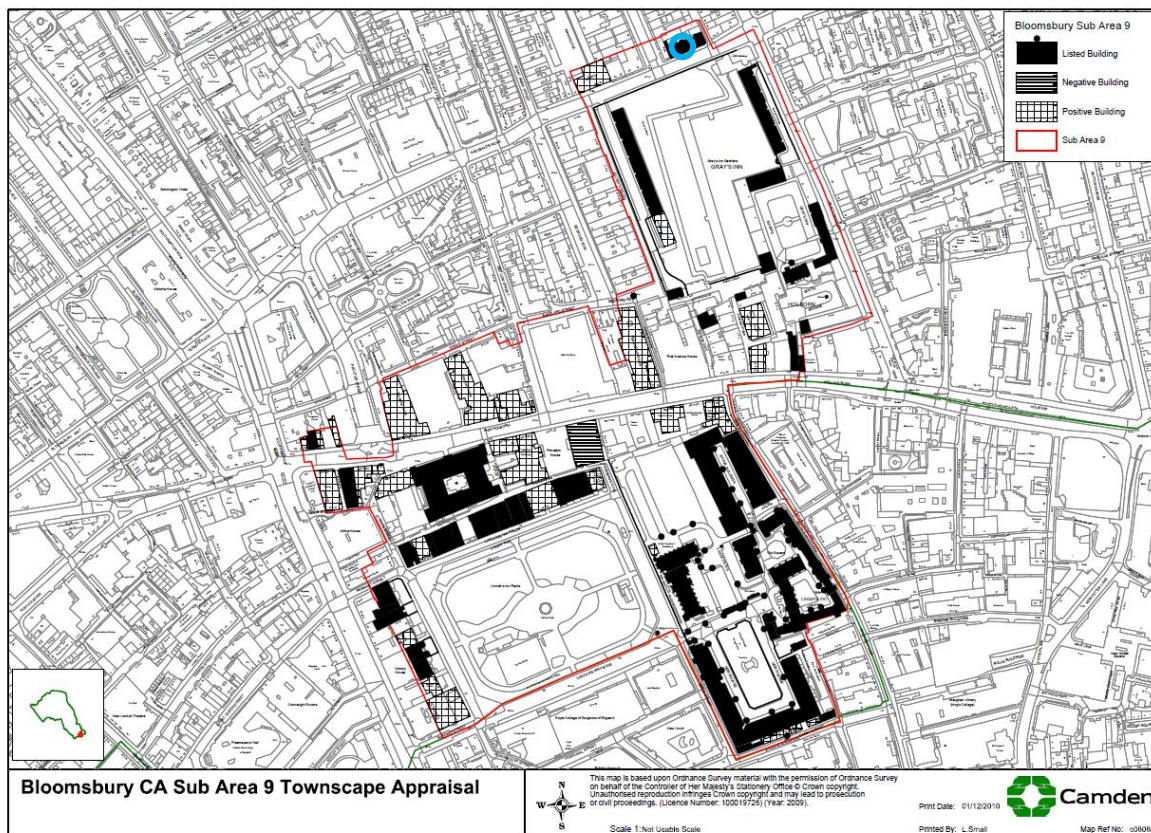


Figure 2: Bloomsbury CA Sub Area 9 Townscape map (source: Bloomsbury Conservation Area Appraisal and Management Strategy Adopted 2011) (subject site highlighted in blue)

No 20 Theobalds Road is statutorily listed Grade II as a part of the listed terrace and its listing description for No's 14-22 states:

“Name: NUMBERS 14-22 AND ATTACHED RAILINGS

List Entry Number: 1379005

Grade: II

Date first listed: 24-Oct-1951

TQ3081NE THEOBALD'S ROAD 798-1/101/1629 (North side) 24/10/51 Nos.14-22 (Even) and attached railings

Terraced houses. c1750, restored 1989. Multi-coloured stock brick. Stone bands at 1st and 2nd floor levels, except No.18 with stone band at 1st floor, 1st floor sill band and stone bracketed cornice at 3rd floor level. 4 storeys and basements. 3 windows each. Good wooden pedimented doorcases with Doric engaged columns carrying entablature with Greek fret frieze. No.20 with enriched consoles carrying flat hood; No.22, with pulvinated frieze and modillion cornice and pediment. All with double panelled doors, Nos 14 and 16 with fanlights. Gauged brick flat arches to recessed sashes, some reddened. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with torch flambe finials to areas. HISTORICAL NOTE: No.22 was the birthplace of Benjamin Disraeli, Earl of Beaconsfield (LCC plaque).”

Planning History

A full planning history is provided in Appendix 1. A summary relating to No. 20 is provided in the table below:

Buildings	Application No	Date	Proposed Works	Outcome
<u>12-22</u>	<u>2019/3767/L</u>	<u>04-11-2019</u>	<u>Removal of ceiling joists at 3rd floor level and associated work</u>	<u>Granted</u>
<u>20</u>	<u>2018/5286/P</u>	<u>04-03-2019</u>	<u>Conversion of a HMO (Class C4) property to create 3no 1-bedroom self-contained flats at lower, ground and 1st floor levels and a 3-bedroom self-contained maisonette (Class C3) at 2nd and 3rd floor level and associated repairs/refurbishment to the building's facade.</u>	<u>Granted</u>
<u>20</u>	<u>2018/5565/L</u>	<u>04-03-2019</u>	<u>Reconfiguration of layout to create 3no 1-bedroom self-contained flats at lower, ground and 1st floor levels and a 3-bedroom self-contained maisonette at 2nd and 3rd floor level and associated internal and external repairs/refurbishments.</u>	<u>Granted</u>
20	9000478	05-10-1990	Provision of connecting door openings between Nos.18 and 20 Theobalds Road on the ground and second floors. (REVISED Plans submitted).	Permitted Development
20	9070179	05-10-1990	The formation of openings in the party wall with No.18 at basement and second floor levels as shown on drawing number 101936/1 revised by letters dated 20th June 1991 and 2nd July 1991.	Granted
12-22	8970028	13-02-1989	External repairs and redecorations to front and side elevations including single storey extension (King's Mews) and part of the main roof ^*(Plans submitted).	Withdrawn
20	8570146	10-05-1985	Erection of demountable partition in second floor room (rear). ^As shown on your 1 unnumbered drawing.	Granted
12-22	N15/6/A/25362	12-10-1977	Change of use of the third floor of 18 and 20 Theobalds Road from offices to residential and thsechange of use of the second floor of 22 Theobalds Road from residential to use as offices.	Permitted
12-22	-	1975	Erection of rear wing	Possibly Permitted
20-22	-	Jan- April 1960	Proposed alterations to the basement	Not known; Possibly never executed

Pre-App Response

A Pre-App meeting with Camden Council's Planning and Conservation Officers was held on site on 28th August 2018 where the proposed works were discussed in detail. The LPA's response was received on 26th September 2018 and was generally positive and supportive of the proposed scheme with a few suggestions.

A copy of the Pre-Application advice letter is enclosed in Appendix 3.

Point 3.7 of the LPA's Pre-App response requests that a daylight/ sunlight study is undertaken to assess the suitability of this space for use as housing. This has been undertaken and a report by TFT dated 16th October 2018 is submitted alongside this application. This report supports the suitability of the space for use as a domestic dwelling, based on daylight/ sunlight surveys undertaken: *"The findings indicate that the proposed scheme...will generally adhere to the intentions documented in the BRE guide and is therefore in accordance with the aims of the London Borough of Camden planning policy in daylight terms."*

Other concerns raised with regards the installation of free-standing kitchen and shower-room facilities have been dealt with by the further details and justification provided (see Proposed Works and Impact Assessment below).

Existing Building

No.20 Theobald's Road (Figure 4) was built in 1750s in a row of multi-coloured stock brick terraced houses, listed on 24th October 1951. It is a multi-dwelling split over five habitable floors (four-storey and lower ground level), with one three bedrooms flat at each level.



Figure 3: View of Nos. 12-22 Theobalds Road from 1944 (source: Collage, London Metropolitan Archives)

The house is orientated South-East and sits mid-terrace within the road. The road has pedestrian and vehicle access from both approaches. The property is currently accessible from a main entrance door at the ground floor; further, a secondary door is located in the lower ground floor and is accessible via a staircase in the front lightwell adjacent the walkway.

Many original architectural features are present throughout the house, such as original stone cantilevered staircase with decorative cast-iron balustrade, fireplaces, cornices, wall panelling, panelled doors and skirting. Please refer to Heritage Impact Schedule (Appendix 6) and the Photographic Schedules of Interior by Assembly Associates accompanying this application for further details.

20 Theobald's Road is a residential building that has been the subject of significant alteration and partitioning by the previous owner, leading to a very confused internal layout. Numerous bedrooms have been created and apartments merged. The building is in a very similar state to that of 22 Theobald's Road, at the time when the Council approved a similar application to this in 2016.



Figure 4: Aerial view of the area around Theobalds Road 1948 (source: Britain from Above)



Figure 5: 1969 view of buildings along Theobalds Road. The building adjacent to No. 22, rebuilt after the war is seen in the foreground and housed the Westminster Bank. (source: Collage, London Metropolitan Archives)



Figure 6: 1969 view of buildings showing No. 12 in the foreground and the other buildings to the rear. (source: Collage, London Metropolitan Archives)



Figure 7: Contemporary view of No's 12-18 Theobalds Road (No20 highlighted)



Figure 8: No 20 Theobalds Road

Some of the original internal period features were damaged when interiors were modified to create smaller rooms and large rear rooms have been subdivided to create multiple bedrooms. A period staircase with decorative balustrade, that rises from ground to second floor, has been enclosed with timber partition in recent times.

Significance Appraisal

Although the building is a listed Grade II, this descriptive appraisal will evaluate No. 20 Theobalds Road against Historic England's criteria outlined in 'Conservation Principles, Policies and Guidance,' which partially overlap with the Statutory Criteria for listing.

They encompass the following values:

- **Evidential Value** – this relates to the potential of the place to yield primary evidence about past human activity;
- **Historical Value** – relevant to ways in which the present can be connected through a place to past people, events and aspects of life;
- **Aesthetic Value** – focusing on the ways in which sensory and intellectual stimulation is derived from the place;
- **Communal Value** – relating to the meaning the building on site has for the people of Bloomsbury and the collective experience of memory it holds.

Consequently, in order to determine the significance of a certain component of a heritage asset the sum of its architectural, historic, artistic or archaeological value needs to be disaggregated and determined.

Evidential value

"Evidential value derives from the potential of a place to yield evidence about past human activity" (Conservation Principles Para 35).

"Evidential value derives from the physical remains or the genetic lines that had been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement" (Conservation Principles, Para 36).

The terrace (Nos. 14-22), which No 20 is part of, is believed to have been the first development built on the relatively undeveloped site. The area is however identified as an 'Area of Archaeological importance' by Historic England.¹ Considering this, the site has some possibility of revealing evidence of past human activity. Therefore, the Evidential value and archaeological potential of the subject site is **medium-high**.

Historical value

"Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative." (Conservation Principles Para 39).

"The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value." (Conservation Principles Para 44).

¹ Camden: Areas of Archaeological Priority

The building is of historic significance as being of the many late 18thC terraces surviving in the area, while many others along Theobald's Road were damaged during the Blitz. The building still features a large number of original surviving interior features and finishes and are therefore examples of their style and type – these are all found on the ground and first floor only. The original floor plans and layouts have been altered due to past alterations. A number of original windows to the front elevation have been replaced most likely mid C20. These have eroded somewhat the historical significance of the building. However, considering the quantity and quality of surviving features and details, the building's historical value is **high**.

Aesthetic value

"Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place". (Conservation Principles Para 46).

"Aesthetic values can be the result of conscious design of a place including artistic endeavour. Equally they can be the seemingly fortuitous outcome of the way in which a place has evolved and be used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive." (Conservation Principles Para 47).

"Design value relates primarily to the aesthetic qualities generated by the conscious design of the building, structure or landscape as a whole. This embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship." (Conservation Principles Para 48).

No. 20 Theobalds Road, dating from the late 18th C is an interesting example of Georgian architecture in Bloomsbury with a number of other similar properties nearby. Their value as a group is of primary significance while assessing the aesthetic value.

The building still preserves a number of interesting original interior details and finishes such as fireplaces, cornices, skirting, staircase etc and some original windows, and this surviving fabric adds to the aesthetic value of the building. Overall the building is considered to have a **high** aesthetic value.

Communal value

"Communal value, derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical value, but tend to have additional and specific aspects" (Conservation Principles, Para 54).

The subject building was designed as a single-family residence and were later converted into HMO dwellings. During its history, the building would have had little or no public interface apart from the residents and any limited significance to the community would be being part of the streetscape of Theobalds Road. Therefore, the overall communal value of the subject building is **low**.

Summary of Significance

The significance of No. 20 Theobalds Road is in its group value as part of an 18thC Georgian terrace in this important streetscape and also in the surviving interior details and finishes. Owing to its location within an archaeological priority area, it is considered to have medium-high evidential value, and due to its age and surviving fabric, it is considered to have high historic and aesthetic values. At the same time, owing to their limited importance to the local community, their communal value is low.

Proposed Works

The applicant's objective is to redesign flats at lower-ground, ground, first, second and third floor levels and create a mix of residential units that comply with Camden Council's Space Standards and Fire Regulations (similar to the consented scheme for No.22 Ref:2016/2284/P and 2016/3278/L, granted 14/06/2016).

In land use terms the proposal is to clarify the layout; creating ~~4~~5 self-contained flats in the form of ~~3~~4 one-bedroom units and 1 ~~two~~ ~~three~~-bed maisonette. This will provide a mix of both good quality, small and larger homes within the scheme.

The below table illustrates the compliance of the development with Camden's Space Standards:

FLAT	Persons	Minimum floors space requirement (sq m)	Actual floorspace (sq m)
1 (Basement)	2	48	62
2 (Ground Floor)	2	48	49
3 (First Floor)	2	48	49
4 (Second & Third Floor)	3 <u>2</u>	61 <u>48</u>	49 <u>105</u>
<u>5 (Third Floor)</u>	<u>3</u>	<u>60</u>	<u>57</u>

The proposals reverse the harm previously caused with unauthorised, inadequate and harmful alterations made to the property in past, in order to subdivide it into the current HMO dwellings.

All the existing original features and the historic fabric are intended to be retained, repaired and revealed as necessary throughout the house. All missing architectural features are to be reinstated to match existing.

Furthermore, all existing unsympathetic items, i.e. mezzanine structures and timber partitions overlaid to original features and historic fabric are to be carefully removed and original finishes repaired and renovated to conservation standard. Other damaged original features e.g. fireplaces, cornices, wall panelling are to be restored to conservation standard wherever practical.

New floor finishes are proposed throughout – lightweight timber floors and carpets – due to the poor condition of the existing floor boards, which will be retained under the new floors.

In the living areas (rear room) at lower-ground, ground, and first floor levels all the proposed furniture/fittings are to be free-standing. The kitchen and shower room are located in this room as free-standing units that are designed like a piece of furniture and high-quality joinery. They do not reach the full ceiling height and are also offset from the existing walls without touching them, in order to preserve the historic plan form which will still be legible.

New integrated kitchen units, free-standing shower room and sanitary fixtures are to be fitted adjacent to the right-hand wall and installed using existing ducting and service runs where possible. New soil ducting is to be connected to the existing external soil pipe (in front of the right-hand party wall). These free-standing units will have a raised floor, installed on top of the joists that run front-to-back (opposite to the existing floor joists that run left-to-right) and the new service runs

are to be installed behind, in the void between the unit and the existing wall, sitting on top of the existing floor, which minimizes any interference and impact on the historic building fabric.

All this will allow the proposed scheme to be fully reversible without any harmful impact on the historic fabric, as these free-standing units will be designed and fitted like a free-standing high-quality joinery, of lightweight materials and minimal fixing points into the building fabric.

These principal rooms, on the ground and first floor, are of significant interest and the floor to ceiling height in these areas is sufficient to enable introduction of a free-standing units to provide the necessary kitchen and bathroom facilities, maintaining the overall integrity, aesthetics and historic character of the rooms.

The front rooms at lower ground floor to ~~first second~~-floor will be reinstated into the bedrooms with all historic features repaired and revealed, which reinstates closely the original plan form. ~~Furthermore, the existing modern flush doors at the lower ground, second and third floor levels are going to be replaced with paneled doors to match either existing or which would be in keeping with the architecture of the building and in accordance of the hierarchical status of the floor level as to which they are located.~~

There are also amendments proposed to layout of the approved three-bed maisonette over the second and third floors. Overall, the second and third floor are of subservient significance to the grander ground and first floor and contain much less surviving decorative historic fabric and architectural features so are less sensitive to changes and alterations.

The new second floor proposed one-bedroom flat largely follows the layout of the ground and first floor, having a living room at the back and bedroom at the front, with a difference being the bathroom location, here proposed within the front bedroom and connecting to the existing service riser. The kitchen is in the rear room as on the floors below, but due to this level having a lower heritage value and significance in comparison, it is not proposed as a free-standing unit like on the ground and first floor.

Existing openings adjacent to the stairs that lead to third floor are being infilled, with architraves retained and door frames also retained if found to be historic, so the entrance to the third-floor flat is provided.

Third floor has even less historic fabric surviving, only the stairs with the enclosing wall, external walls and sections of the central partition wall indicating the historical lobby and front rooms division – all these will be retained. Proposed layout follows the same principle like on the floors below with living area in the rear room and bedrooms at the front. Two front bedrooms are of similar layout to that already consented with refs. 2018/5286/P and 2018/5565/L, having a smaller (right hand side) bedroom slightly reduced becoming a single now, to allow for a wardrobe in the master bedroom. An ensuite and a family bathroom are in the same central location as previously consented ensuite. Rear room is proposed to be an open plan kitchen/dining/living area. Central modern partition is proposed to be removed, but the wall nib will be retained to indicate a historical plan-form.

Furthermore, the existing modern flush doors at the lower-ground, second and third floor levels are going to be replaced with paneled doors to match either existing or which would be in keeping

with the architecture of the building and in accordance of the hierarchical status of the floor-level as to which they are located.

~~The second and third floor maisonette layout~~ All the proposed flats (basement to third floor) largely reinstates the historic plan form and offers a considerate response to the limitations of the listed building while providing a suitable accommodation and facilities and minimizing number of partitions. ~~These levels are also of subservient significance to the grander ground and first floor and contain much less surviving decorative historic fabric and architectural features.~~

The timber-framed partition that encloses the staircase to the communal hallway is intended to be removed to expose the original handrail and ironwork to the balustrade. Both the stone staircase and the balustrade are to be overhauled, repaired as necessary and redecorated. Refer to proposed set of drawings for details.

In order to comply with the Fire Regulations measures appropriate for the listed building and sympathetic to the historic fabric will be used, like intumescent strips and smoke seals to doors and intumescent paint to walls and ceilings where necessary.

It is proposed to sensitively refurbish the exterior of the property - the brickwork is to be cleaned to their original palette and repaired where necessary, features such as windows and railings will be cleaned, repaired and redecorated as necessary too. There is to be a renewed lighting scheme to the front of the building which will propose a pendant light fitting under the frieze of the entrance portico. Existing CCTV system will be replaced with new cameras limited to the existing locations.

For further details see Proposal drawings by SLHA that accompany this application.

Heritage Benefits

There will be important heritage benefit through removing the partitioning and through repairing significant damage that has occurred to the listed building. The approach taken to the layouts is the same as that intended for 22; namely to minimize further, permanent, intervention.

A number of heritage benefits would result from the proposed works. These include:

- Reinstatement of the original plan form and all missing architectural features throughout
- Repair and refurbishment of all existing architectural features throughout.
- Repair and cleaning of the external elevations, including the windows and railings.

These heritage benefits would enhance the special interest of the listed building through the internal and external refurbishment works. The proposed external works are proposed to enhance the character and appearance of the conservation area.

Impact Assessment

The proposed works have received a positive and supportive response from the LPA, which states that *"converting the property back into self-contained housing with plan forms more closely aligned*

with the original form would be a heritage benefit for the building”² C3 and “removal of partitions and unsympathetic additions, and the restoration of the historic features to this property is welcomed by the officers and would be considered a significant heritage benefit for the site”³.

The proposed scheme consists of minor internal alterations with minimal interference with the historic building fabric. The proposed works are minor in nature, discrete and not visible from the public realm.

In summary, the proposed internal alterations have negligible impact on a special interest of the listed building historic building fabric as no-minimal original fabric will be removed and the historical plan form will be reinstated. All the repairs will be like-for-like and to conservation standards. It is considered that proposals do not compromise the special interest of the building and its setting. It is also considered that proposed mix of self-contained units are-is an appropriate use for this heritage asset as it will enable removal of unsympathetic additions and partitions, reinstatement of the plan form more closely aligned with the original form and restoration of historic architectural features.

The residential accommodation that will be created will be of a good quality and will meet the requisite minimum size standards. A daylight and sunlight report forms part of the application and demonstrates that the daylight and sunlight that the premises at the lower ground floor will receive will not be unusual. Design mitigation is provided to ensure the accommodations privacy from the retained rear office.

In judging the overall effect of the proposed alterations on the special interest of the heritage asset and the character and appearance of the conservation area, it is considered that there is no harm and the overall impact would be substantial beneficial.

Services

Most services appear to be modern and there is certainly a scope in improving them sympathetically so as to avoid clash with the historic fabric. The existing service stacks and service routes are to be retained, used and upgraded as necessary. New services will be sensitively introduced in less contentious spaces, floors/ceilings/walls void where possible and only when necessary. Refer to Services Strategy Report by MWL attached in Appendix 5 of this report.

Access

The site has a PTAL rating of 6b.

The property is directly accessed from the walkway on Theobald’s Road and has no front garden. There is a gate and railings to enclose the lightwell and to give safe access to the staircase to the lower-ground floor.

The main entrance door level at ground floor is currently accessed by three steps from walkway level. A further step is located just underneath the door itself. It will not be possible to modify the entrance externally to introduce ramped access without compromising architectural quality and the special interest of the Listed building, therefore the steps are going to be kept as existing. However, a foldable metal ramp could be placed temporarily over the front steps should a

² LPA’s Pre-App response, Pg.3

³ LPA’s Pre-App response, Pg.3

wheelchair user require access to the ground floor accommodation. The ramp could be folded and stored within the communal entrance hall.

As previously mentioned, in order to completely expose the period handrail and balustrade in the communal hallway, the timber-framed partition that encloses the staircase is going to be fully removed, including the door that currently separates the flight of stairs going from the ground floor to the lower-ground floor. The existing door at the bottom of the stair at the lower-ground floor level is then to be permanently shut.

Therefore, the only access to the lower-ground floor will be via the external staircase to the lightwell.

Policy Justification

This Justification Statement should be read alongside the SLHA Impact Assessment, “*Schedule of Works Carried Out and Description of Interventions.*”

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66: General duty as respects listed buildings in exercise of planning functions.

Section 66 states that in the determination of planning applications which affect a listed building or its setting, ‘the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’ This report has considered the physical impact of the proposal on the listed building and has determined no harm will occur.

National Planning Policy Framework (NPPF)

The National Heritage Policy, NPPF (2012) has since been replaced by a new edition in July 2018. The NPPF sets out the Government’s planning policies for England and outlines how these should be applied.

This section discusses the impact of the proposals according to the NPPF. The NPPF contains a presumption in favour of sustainable development sympathetic to the conservation of designated heritage assets. The policies relevant to heritage matters are contained within paragraphs 184 to 202 of the Framework.

Paragraph 189:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. 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.”

Response: This heritage statement describes the historic background and development of the subject building and the area. An appraisal of the building’s significance has been undertaken as per Historic England’s guidelines. The relevant HER has been consulted both through archive visits as well as desk-based study. The appendices provide further information on the development of the area, a detailed planning history and morphological drawings. The extent of research has been proportional to the significance of the heritage asset.

Paragraph 192:

“In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness."

Response: The proposed development would result in a positive contribution to the physical fabric of the listed building and the character and appearance of the conservation area through the substantial public benefits it delivers. The benefits of the proposed development have been discussed in the section on Impact Assessment above.

Paragraphs 193 and 194:

"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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. 194: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

Paragraph 196

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

Response: The proposed development would result in no harm and would in fact deliver substantial heritage benefits to the listed building and the conservation area. This has been demonstrated in the section on Impact assessment.

London Plan Policies:

Policy 7.8 Heritage assets and archaeology

- a) London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.*
- b) Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.*
- c) Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.*
- d) Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.*

Response: This heritage statement provides an appraisal of the heritage assets drawing from the relevant historic environment record (HER). The significance of the subject building has been assessed as per Historic England guidance and has been presented in the sections above.

The proposed refurbishment of the building would help in restoring and reusing the subject building, without causing any harm but rather creating substantial heritage benefits.

Camden Local Plan

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance 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 and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;*
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.*

Para 7.54 *The character and appearance of a conservation area can be eroded through the loss of traditional architectural details such as historic windows and doors, characteristic rooftops, garden settings and boundary treatments. Where alterations are proposed they should be undertaken in a material of a similar appearance to the original. Traditional features should be retained or reinstated where they have been lost, using examples on neighbouring houses and streets to inform the restoration. The Council will consider the introduction of Article 4 Directions to remove permitted development rights for the removal or alterations of traditional details where the character and appearance of a conservation area is considered to be under threat.*

Response: As demonstrated in the sections above, the proposed development intends the refurbishment and reuse of the existing listed building. This proposal has been informed by a detailed assessment of the building, its historical development and morphology and the surviving features that contribute to its special interest. The proposed works would enhance these elements. The refurbishment and reuse of the building would also positively contribute to the character and appearance of the conservation area.

Conclusion

It is considered that this proposal fully complies with the relevant local and national policies in respect of the special interest of the Grade II Listed Building and provides sustainable use for the future.

The proposal has been designed to cause **no harm** to the significance of the statutorily listed building, it will affect largely modern unsympathetic fabric, having a positive impact on the special interest of the listed building. Whilst there will be minimal visual impact through creation of the free-standing shower room and kitchen, the original planform will be sustained and remains legible, while all historic fabric will be retained, revealed and restored as necessary. It is, therefore, considered that the **significant heritage benefits** offered by the scheme would balance out any potential impact, as they will greatly enhance an appreciation and understanding of the special interest of the listed building. These benefits include:

- Reinstatement of the original plan form and all missing architectural features throughout;
- Repair and refurbishment of all existing architectural features throughout.
- Repair and cleaning of the external elevations, including the windows and railings.

Therefore, the proposal is considered to not just sustain, but enhances the special historic and architectural interest of the statutorily listed building by preserving and enhancing those elements of significance that have been identified as contributing to that special interest and removing or altering those elements which are detrimental to that interest. It is therefore concluded that the proposed works satisfy the relevant clauses of the NPPF. These are consistent with the spirit of local, regional and national policies and conservation principles.

Appendix 1: Planning History

A detailed planning history of the subject buildings is provided below. The earliest records of planning and listed building applications for the subject buildings available online date from 1977, however a number of applications were traced from the local archives and have also been summarily listed in the table below .

Buildings	Application No	Date	Proposed Works	Outcome
22	2016/3278/L	14-06-2016	Internal alterations to GII listed building associated with its sub-division into 2 x studios and 1 x 3 bedroom maisonette.	Granted
22	2016/2284/P	14-06-2016	Subdivision of existing building (C3) to form 3x self-contained flats (2 x studio and 1 x 3b6p maisonette). No external alterations.	Granted subject to a Section 106 agreement
22A	2011/0703/L & 2011/0703/P	28-02-2011	Change of use from offices (Class B1) to a sports studio (Class D2) with associated internal alterations and installation of three external air handling units at basement level.	Withdrawn
18	2008/2834/L	12-06-2008	Internal alterations associated with change of use of top floor from residential use (Class C3) to office use (Class B1).	Granted
18	2008/2340/P	12-06-2008	Change of use of top floor from residential unit (Class C3) to office use (Class B1).	Granted
14-16	2005/1735/L	19-07-2005	The formation of an internal ground floor level doorway between No.14 & No.16 Theobalds Road.	Granted
12-18	PSX0105017	04-01-2002	Installation of 3 air conditioning units and associated louvred screening on flat roof at rear of No. 12, including ladder access to rear roof, as shown on drawing numbers; Acoustic report; 23-00-s/1; 23- 00-19C; 26; 27C; 28A; 29A.	Granted
12-18	LSX0104896	04-01-2002	Internal refurbishment of the existing offices and ancillary residential of nos 12 and 14 including the installation of a new staircase, installation of 3 No. air conditioning units and associated louvred screening on the flat roof at rear of no 12, including ladder access to rear roof; installation of stainless-steel restraints at parapets to nos 12 - 18; installation of fixed ladder access to all roofs	Granted with conditions
22	PS9704837R2 & LS9704838R2	02-01-1998	Change of use from offices to residential, consisting 1 no. three bedroom flat, 1 no. one bedroom flat and 2 no. studio flats together with the demolition of a single storey rear addition	Granted with Conditions
22	PS9704837R1 & LS9704838R1	06-10-1997	Conversion of building to flats and removal of modern addition to rear basement. (REVISED PLANS SUBMITTED)	Withdrawn
22	PS9704837 & LS9704838	13-08-1997	Conversion of building to flats and removal of modern addition to rear basement. (Plans submitted)	Withdrawn

20	9000478	05-10-1990	Provision of connecting door openings between Nos.18 and 20 Theobalds Road on the ground and second floors. (REVISED Plans submitted).	Permitted Development
20	9070179	05-10-1990	The formation of openings in the party wall with No.18 at basement and second floor levels as shown on drawing number 101936/1 revised by letters dated 20th June 1991 and 2nd July 1991.	Granted
12-22	8970028	13-02-1989	External repairs and redecorations to front and side elevations including single storey extension (King's Mews) and part of the main roof ^*(Plans submitted).	Withdrawn
20	8570146	10-05-1985	Erection of demountable partition in second floor room (rear). ^As shown on your 1 unnumbered drawing.	Granted
12-14	N/15/6/A/1944	07-06-1978	The erection of partitions on the ground, first, second and third floors and the formation of an opening in the party wall between the ground floor rear rooms (works already carried out).	Permitted
12-22	N15/6/A/25362	12-10-1977	Change of use of the third floor of 18 and 20 Theobalds Road from offices to residential and thsechange of use of the second floor of 22 Theobalds Road from residential to use as offices.	Permitted
12, 14; 16, 18	-	1976	Alterations to all floors (internal) and erection of rear wing	Possibly Permitted
12-22	-	1975	Erection of rear wing	Possibly Permitted
22	-	March 1965	Conversion of second floor to form two roomed flat	Not known; Possibly never executed
12	-	April 1961	Proposed bathroom	Not known
20-22	-	Jan- April 1960	Proposed alterations to the basement	Not known; Possibly never executed
14- 18	-	Oct 1958	Proposed internal alterations	Not known
16	-	September 1950	Proposed new lavatories to No. 16 Basement	Not known
12	-	1939	New lavatory and other alterations	Not known
12	-	July 1899	Drainage works at basement level	Not known
14	-	1895	Drainage works at basement level	Not known
	-	September 1893	Drainage works at basement level	Not known
16-18	-	September 1892	Drainage works at basement level	Not known

Appendix 2: Map Progression

The following section provides a progression of historic maps from 1746 to the present day, illustrating the development of the area. Nos. 14-22 Theobalds Road built in the late 18thC and No. 12 built in the early 19thC are seen in all these maps except John Rocque's Map. These subject buildings have been outlined in red.

The following maps are presented in the section below:

- John Rocque's 1746 Map
- 1851 OS Map
- 1874 OS Map
- 1895 OS Map
- 1916 OS Map
- 1937 OS Map
- 1952 OS Map
- 1963-33 OS Map
- 1973 OS Map
- Contemporary OS Map

John Rocque's 1746 Map

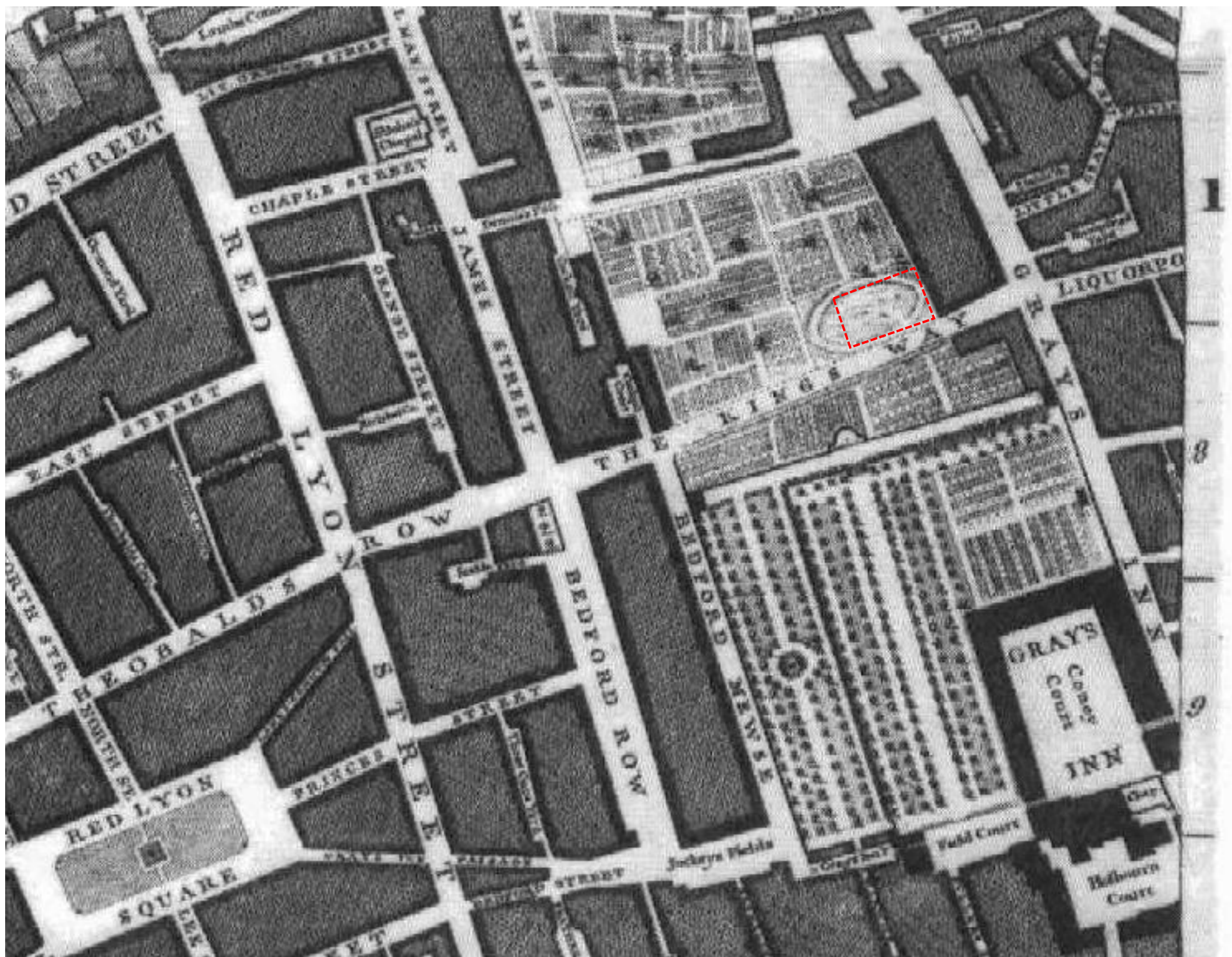


Figure 1: In the mid 18thC, the subject buildings had not yet been built, however their site was occupied by well laid out gardens north of The Kings Way. As seen in this map, the areas west and south of the subject buildings were well developed and built by this time. Gray's Inn gardens were a landscaped open space and is seen immediately south of the site. Red Lion Square and Gardens are seen to the southwest of this map.

1851 OS Map



Figure 2: In 1851, this section continued to be called 'King's Road' possibly reflecting King's Mews which were located nearby. This map was prepared before the construction of Rosebury Avenue. The principal streets, as they are now have been laid out by this time. This map does not show the extant buildings on the site, however the subject buildings would have been built by this date.

1874 OS Map



Figure 3: This detailed map of the area dating from 1874 shows the subject buildings with a number of closet wing extensions to the rear. A number of other terraces are seen in the area, along Kings Street, Grays Inn Road and other roads in the area.