

**PUBLIC CONVENIENCIES AT GUILFORD PLACE
LONDON WC1N**

**SHORT HERITAGE STATEMENT FOR
RETROSPECTIVE LISTED BUILDING CONSENT
FOR BLOOMSBURY WINE BAR LTD**

Compiled by Luciana Gallo, RIBA, PhD, FSA

March 2020

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1.0 INTRODUCTION AND BACKGROUND

This report should be read in conjunction with the document 'Public Conveniences at Guilford Place, London WC1N Heritage Statement on behalf of Coppin Street Properties' compiled by Luciana Gallo, and dated December 2016. That report was part of applications for Planning Permission (2015/6141/P) and Listed Building Consent (2015/6885/L) that were granted on 25 July 2017 (subject to a Section 106 Legal Agreement) and 27 July 2017, respectively. This addendum report describes implemented but unauthorised change to works illustrated and justified by the earlier report.

The works described in this report are in the way of design modification rather than fundamental alteration to the proposals of 2016. For the sake of clarity, the December 2016 application proposals are described throughout this report as the 'consented application scheme'. Because the implemented unauthorised works do not change the nature of the consented application scheme, this report is drafted as an addendum to the earlier report. The justification of the unauthorised works fundamentally also remains the same with the 'benefits' which accrued from the consented application scheme. For this reason, this addendum assesses the implemented changes on the basis on whether they have resulted in enhancement or detraction from the consented scheme. It provides an assessment on balance that the changes have not caused 'harm' that is greater than the 'benefits' that would have ensued from the proposals overall.

2.0 THE CHANGES TO THE CONSENTED APPLICATION SCHEME

Please note that the room references used in this paragraph are consistent with those marked on the survey drawings enclosed in Appendix II of the document 'Public Conveniences at Guilford Place, London WC1N Heritage Statement for Coppin Street Properties' produced by Luciana Gallo and dated December 2016.

2.1 The Implemented Unauthorised Works and their Implications

The changes to the consented application scheme are illustrated on Dexter Building Design's drawings 1346_V02.08-P102; 1346_V02.08-P103; 1346_V02.08-P104; 1346_V02.08-P301; 1346_V02.08-P302; 624. 1-05 Electrical Plan (Rev. F); 624. 1-06 Services Plumbing Plan (Rev. D); 624. 1-06 Lighting Plan (Rev. E); and site photographs 1346_V01.00-P701 and 1346_V02.08-P303.

The implemented works have seen the following change to the consented application scheme:

2.1.1 New Opening in Existing Spine Wall

The change has seen the formation of a new lateral connection between the originally separate sections of the conveniences, in addition to the opening proposed in the consented application scheme. The new 1m-wide and 2.1m-high opening, located in proximity of the existing link in the spine wall, is supported by a concrete beam.

The works have entailed removal of original fabric of merit consisting of ivory glazed brickwork. However, while just a limited amount of significant fabric has been lost with consequent negligible impact on the significance of the heritage asset, circulation and spatial efficiency have been greatly improved.

In conclusion, the proposed changes could be considered only marginally worse for the historic environment compared to the consented application scheme. However, they would not affect areas and features of primary significance and would lead to benefits in terms of functionality, as well as maximisation and visual appreciation of the historic space.

2.1.2 Reduction of Width of New Opening in Spine Wall and Rearrangement of Cubicles Partitions in Both Sections

The width of the new opening in the northern section of the spine wall, as proposed in the consented application scheme, has been reduced by 40cm in the implemented works. As a consequence of this, as well as of the new opening commented in paragraph 2.1.1 of this report, the location of retained and removed glazed partitions

in the cubicles has been altered from those intended in the consented application scheme. The result is that just two original partitions have been lost - instead of the three included in the consented application scheme - and one has been relocated.

The implications of these changes appear to be more beneficial to the heritage asset in comparison to the consented application scheme, as a greater extent of significant historic fabric has been retained reducing harm to the listed building and leading to a better appreciation of its original layout and finishes.

2.1.3 Omission of Enlargement of Existing Opening in the Spine Wall

The existing opening, originally leading to the store room M5 in the gentleman's section, which was intended to be increased in size in the approved scheme, has been retained as existing.

This change has resulted in the preservation of original fabric of merit, with beneficial implication for the listed building in comparison to the consented application scheme.

2.1.4 Omission of Removal of Existing Tiled Wall in F5

The intended removal of an original glazed brickwork partition to form an accessible customers' lavatory in the existing storage room in the women's section has been omitted. This has resulted in retention of the original plan form of this space and surviving fabric of merit.

Overall, this change has led to greater benefits for the designated heritage asset in comparison to the consented application scheme.

2.1.5 Change of Use and Addition of Stainless Steel Panels in M4; Omission of Removal of Existing Partition and Joinery in F4

The preparation area and store room which were intended to be located in the original attendants' rooms F4 and M4, respectively, in the consented application scheme, have been changed into two preparation areas. The proposed removal of the existing glazed-timber partition in F4 - to allow access to and from the serving area located behind the new counter - has been omitted and the surviving joinery restored.

The stainless-steel backing panels to the proposed - but not executed - cabinetry along the existing glazed walls in F4 have been implemented as proposed in the consented application scheme. The metal cladding has, however, been extended to include also

the walls in M4, due to the new use. However, in deviation from the consented application scheme, the relevant walls in these areas have not been previously dry-lined, with the consequence that the metal panels have been screw-fixed directly to them.

In order to comply with environmental health requirements, the original herringbone timber floor has been retained underneath an upper layer of vinyl sheeting applied on plywood board.

Overall, these changes can be considered to be slightly worse for the heritage asset compared to the consented application scheme, as some glazed brickwork areas - which were already in advanced state of disrepair - have been affected. However, the changes have seen the retention and restoration of significant original joinery, resulting in a clear benefit for the listed building.

2.1.6 Replacement of Timber Shelves with Free-Standing Benches Along External Walls in F1 and M1

The timber shelves, which were intended to be screw-fixed to the external walls in both sections of the conveniences, as for the consented application scheme, have been replaced with free-standing benches to allow customers to enjoy a better outlook of the interior space. Their backrest has been screw-fixed to the existing glazed walls.

The implication of this change for the historic environment is neutral in comparison to the consented application scheme.

2.1.7 Change of Use for Existing Urinals and Omitted Boxing-out of Single-bay Easternmost Urinal

The original porcelain urinals have been retained in accordance to the consented application scheme. However, instead of fitting them with custom-made unitary timber shelves, they have been fitted out to accommodate customers' seating. This has involved the design of a free-standing timber structure including individual cushioned seats in each bay, and the covering of the upper section of the urinals with false leather supporting soft-padded backrests. The new design has allowed for the omission of the boxing-out of the easternmost single-bay - due to its defective state - as intended in the consented application scheme, and its fitting out as described above.

In conclusion, the proposed change appears to be only slightly worse for the historic fabric compared to the consented application scheme. However, the implemented works, while allowing for a more customer-friendly use leading to a better

appreciation of the facing historic interiors, are fully reversible as the glue-fixed false leather covering can be removed without implications for the underlying porcelain units.

2.1.8 Proposed New Entrance Doors Replaced with Reclaimed Timber Doors in F1 and M1

The unsympathetic and decaying post-war steel security entrance doors which were intended to be replaced with new replica timber doors according to the consented application scheme, have been substituted with compliant timber doors reclaimed from an alien site.

This change has neutral implications for the significance of the designated heritage asset in comparison to the consented application scheme.

2.1.9 Omitted Removal of Existing External Security Concrete Cladding to Windows in F1 and M1

While the original window units located on the staircases' inner wall have been refurbished, their modern security pre-cast concrete exterior cladding has not been removed, contrary to what indicated in the consented application scheme.

This change, implicating the retention of unsympathetic post-war components, appears worse for the character and appearance of the heritage asset, compared to the consented application scheme.

2.1.10 Addition of Cable Racking Service System

All cabling for fire safety, CCTV cameras and lighting, as well as ducting, have been located on a metal tray clamped to the roof beams. The latter are modern components that have been implemented as part of the consented application scheme to replace the collapsed historic roof structure.

A number of glazed panels have also been suspended from the mentioned ceiling trays in F1 and M1 to reduce the extended volume of this small space, thus providing better overall proportions.

In conclusion, the implemented racking service system has a neutral impact on the heritage asset. In fact, while it does not harm original fabric being suspended from modern beams, is also fully reversible thanks to the removable clamping system.

2.1.11 Omission of Existing Passive Fresh Air Ventilation

The existing air vent located on the external southern wall above the urinals has been blocked off, while the existing air vent on the same wall in M5 has been retained and

connected to low pressure air duct discharging via the existing cast iron grill outlet at pavement level.

The implemented change appears more visually invasive for the historic environment than that proposed in the consented application scheme, as the wall plate and duct stand out against an original glazed wall. However, apart from being a reversible intervention, it results in significant public benefits in terms of improvement of the overall ventilation system for the proposed underground charcuterie/bar.

2.1.12 **Change of Lighting Strategy**

The implemented lighting strategy has seen the omission and addition of a number of new fittings. These include: omission of six Cooli-con Factory Lux Industrial Lamps intended to be fixed to the underside of the new concrete roof beams in F1 and M1; addition of another pendant light to the three already consented in the previous application scheme to be located above the bar counter and clamped on modern beams; addition of two picture light fittings on the wall behind the bar counter; replacement of the consented three pendant lights above the retained converted urinals with three wall-mounted fittings; addition of one pendant light fixed to the existing concrete roof and centred above the new booth in M5; addition of four ceiling light fittings fixed to the original cross timber beams in the converted cubicle booths; addition of a ceiling light fitting mounted to the concrete roof of the toilet in F5; addition of two wall-mounted light fittings fixed to the concrete lintels above the entrance doors to both conveniences.

The style of the implemented light fittings is shown on Dexter Building Design's photograph sheet 1346_V02.08-P303. Although they do not reflect the exact models proposed in the consented application scheme, they are considered to be sympathetic and appropriate to the character and appearance of the designated heritage asset.

The use of surface mounted galvanised conduits for the electrical supply reflects the consented application scheme. This strategy had been chosen in order to avoid harm to surviving historical fabric of merit on internal and external walls of the designated heritage asset.

In conclusion, the implemented lighting strategy has provided this dark underground space with services necessary for the new proposed use and appropriate to the historical context. However, the screw-fixing of a slightly increased number of fixtures and light fittings to the existing glazed walls has impacted a slightly greater number of historic tiles in comparison to those involved in the consented application scheme. However, apart from the fact that the relevant components were already damaged, their number has remained very limited.

2.1.13 Change to Foul Water Drainage Strategy

Existing soil pipes have been retained in both halves of the conveniences in deviation from the consented application scheme. The significant positive outcome is that the intended invasive digging of new soil ducting on the original terrazzo floor has been omitted.

However, the non-compliance of the existing manholes, has implicated the formation of two new ones in F1 and M1, respectively. Their covers have been clad with terrazzo tiles which do not exactly match the existing floor finish resulting in a negative impact on the appearance of the historic asset.

Notwithstanding the latter point, the change of strategy has to be considered overall more beneficial for the heritage asset as the loss of original fabric has been considerably reduced.

2.1.14 Addition of Security Appliances and Radiators

Discreet CCTV cameras have been mounted above the entrance doors of both external underground accesses to the conveniences. Five additional CCTV cameras and two fire safety sensors have been fixed internally to the racking tray suspended from the modern roof steel beams.

Illuminated fire escape signs surmount the entrance doors to the interior of the site. These appliances have been screw-fixed to the original glazed brickwork.

Electrical radiators have been screw-fixed on the concrete lintels surmounting the entrance doors.

While the impact of these interventions to the historic fabric is very marginal, they provide essential and needed public benefits in terms of comfort and security.

In conclusion, while some of the proposed changes have resulted in some clear heritage benefits due to the retention of extended areas of original fabric, the majority of them could be considered either neutral or only marginally worse for the historic environment compared to the consented application scheme. However, the latter would not affect areas and features of primary significance and would lead to public benefit in term of provision of services, improvement of circulation maximisation of space, as well as better appreciation of the heritage asset.

3.0 JUSTIFICATION

The **National Planning Policy Framework** (rev. 2019) requires at **paragraph 190** for local authorities to *identify and assess the particular significance of any heritage asset that may be affected by a proposal*. The nature of the significance of the Public Conveniences at Guilford Place has been assessed in the full report produced in 2016 to accompany the consented application scheme.

The current proposals do not affect any of those elements which form part of the primary significance of the heritage asset and, as such the requirements of **policies 185a and 192a (Sustaining and enhancing significance)** of the same document are clearly met.

The minor loss of historic fabric entailed by the proposed changes cannot be considered ‘substantial’, as indicated at **policy 195** of the NPPF which, therefore, cannot apply. **Policy 196** appears, on the contrary, relevant. This policy sets out that *where development proposals were to generate less than substantial harm to the significance of a designated heritage asset, this can be outweighed by public benefits*.

In addition, Historic England's **Advice Note 2 (Making Changes to Heritage Assets)** (2016) has specific advice for alterations to heritage assets. This includes the following relevant note at **paragraph 43**:

The junction between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting. Where possible it is preferable for new work to be reversible, so that changes can be undone without harm to historic fabric. However, reversibility alone does not justify alteration. If alteration is justified on other grounds then reversible alteration is preferable to non-reversible. New openings need to be considered in the context of the architectural and historic significance of that part of the asset and on the asset as a whole. Where new work or additions make elements with significance redundant, such as doors or decorative features, there is likely to be less impact on the asset's aesthetic, historic or evidential value if they are left in place.

As commented in the previous paragraph, the limited removal of original masonry has not affected any areas or surviving features of primary significance. Apart from the fact that some of these interventions are fully reversible, the implemented works have

led to benefits in public and heritage terms that outweigh any ‘less than substantial harm’. These include the omission of the previously consented enlargement of lateral links between the two halves of the conveniences, the retention of the surviving plan form and joinery of the original storage room; the restoration of historic joinery; the retention of the existing soil pipes. Further benefits comprise, improved circulation, better use of the available space and a significant increase in much needed service provision. The implementation of a suitable viable use has also removed any risks for the future conservation of the heritage asset.

The above assessment confirms that the new scheme also meets the requirements of **policy DP25** of the **Camden Development Policy 2010-2025** which requires that consent for change of use and alterations and extension works to listed building will be granted only *where it [the Council] considers this would not cause harm to the special interest of the building*. is clearly met by the current proposals, as they do not affect any elements which contribute to the primary significance of the heritage asset, the nature of which has been assessed in the full report produced in 2016 to accompany the consented application scheme.

Similarly, the **London Plan** requirement at **policy 7.8 C** for proposals to *identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate*, is met by the implemented plans.

4.0 CONCLUSION

In its summary conclusion, the report of December 2016 stated that the consented application scheme would:

repair the decaying original fabric, restore significant features and implement a new use appropriate to the building and the urban context. This would help preserve the significance of the listed building.

Loss of original fabric would be limited to openings in the original masonry and removal of existing partitions to enhance circulation and provide facilities for the intended new use.

Any harm that may occur due to the proposed loss of original fabric would be outweighed by the heritage and public benefits of removing any risks to the building, and revitalising this obsolete site safeguarding its future conservation.

In conclusion, the proposals would lead to substantial benefits for the built heritage in terms of the investment in it to help provide a long term viable use. These benefits far outweigh any perceived harm

The implemented changes to the consented application scheme have not altered this conclusion.