

250 GRAYS INN ROAD, WC1X 8JR

HERITAGE STATEMENT



Ref: 19.594.HUL

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HS1 LISTED BUILDING DESCRIPTION

1.0 INTRODUCTION

- 1.1. This Heritage Statement has been produced by heritage unlimited to support a Listed Building Consent application for works at 250 Grays Inn Road.
- 1.2. 250 Grays Inn Road is a commercial and residential property with a retail catering unit to the lower and ground floors and self-contained flats to the upper floors. The proposed works in this instance relate only to the commercial unit. It forms part of a grade II listed building situated within Sub Area 14: Calthorpe/Frederick Street of the Bloomsbury Conservation Area.
- 1.3. As the work affects a designated heritage asset, a Heritage Statement is required to support the relevant planning application and this document has been prepared in accordance with the National Planning Policy Framework (2019) (NPPF).
- 1.4. The purpose of a Heritage Statement is to identify the significance of any heritage asset affected by the proposed development, the impact the proposed development will have upon the identified significances and justification for the proposed development. The Heritage Statement also assesses the proposed work in accordance with the statutory tests provided in the Planning (Listed Buildings and Conservation Areas Act) 1990.
- 1.5. Works to the property include the renewal of rear ground floor extension glazed roof and redecoration of ground floor shopfront. The application seeks to regularise the planning status of these works.
- 1.6. This Heritage Statement should be read in accordance with architectural plans and other supporting documents, which form this planning application.
- 1.7. This report has been compiled by Chris Mace BA (Hons), MA and is based on research and a site visit carried out in April 2019.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1 250 Grays Inn Road is situated on the east side of the road and forms part of a terraced row of shops with residential accommodation above. The property is located to the northern end of the row.
- 2.2 The building dates from the early 19th century and is constructed from a stock brick. It is of four storeys including lower ground floor. It has a ground floor rear extension.
- 2.3 The ground floor has a 20C shopfront. The upper floors have 2 windows each with gauged brick flat arches to recessed sash windows with glazing bars.
- 2.4 The centre valley main roof is hidden behind the parapet. The rear extension has flat and mono-pitch roofs.

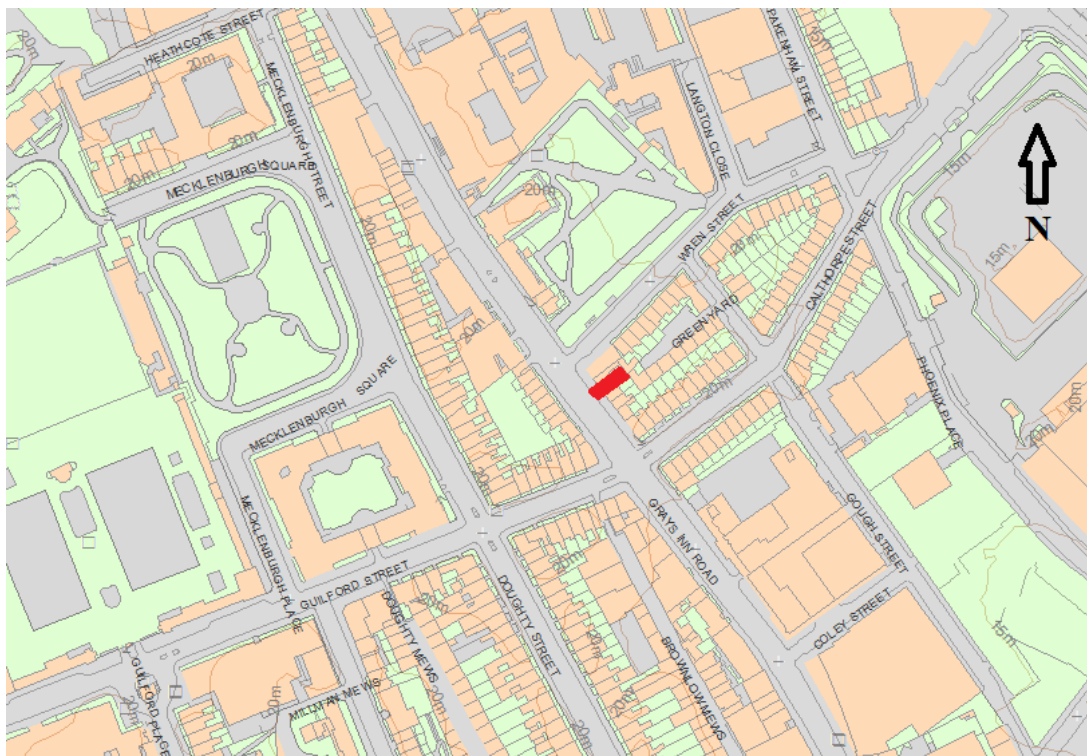


Fig. 1: Location map.

3.0 IDENTIFIED HERITAGE ASSETS

- 3.1 The National Planning Policy Framework (NPPF) requires that all heritage assets affected by the proposed development are identified and their significance, which includes setting is described. The level of harm the proposed works will have on the identified heritage assets also needs to be determined within the context of a Heritage Statement.
- 3.2 As identified above, 250 Grays Inn Road forms part of the terraced row comprising of Nos.244-250 (even) Grays Inn Road (Listed Entry Number: 1113129). All the properties in this row are grade II listed for group value and the listing description is given in **HS1**.
- 3.3 The properties along with the Calthorpe Arms Public House and 240 and 242 Grays Inn Road form a group along the east side of Grays Inn Road.
- 3.4 The property is also situated within Sub Area 14: Calthorpe and Frederick Street, of the Bloomsbury Conservation Area, which was designated in 1968 and the current Conservation Area Appraisal and Management Strategy was adopted in April 2011.

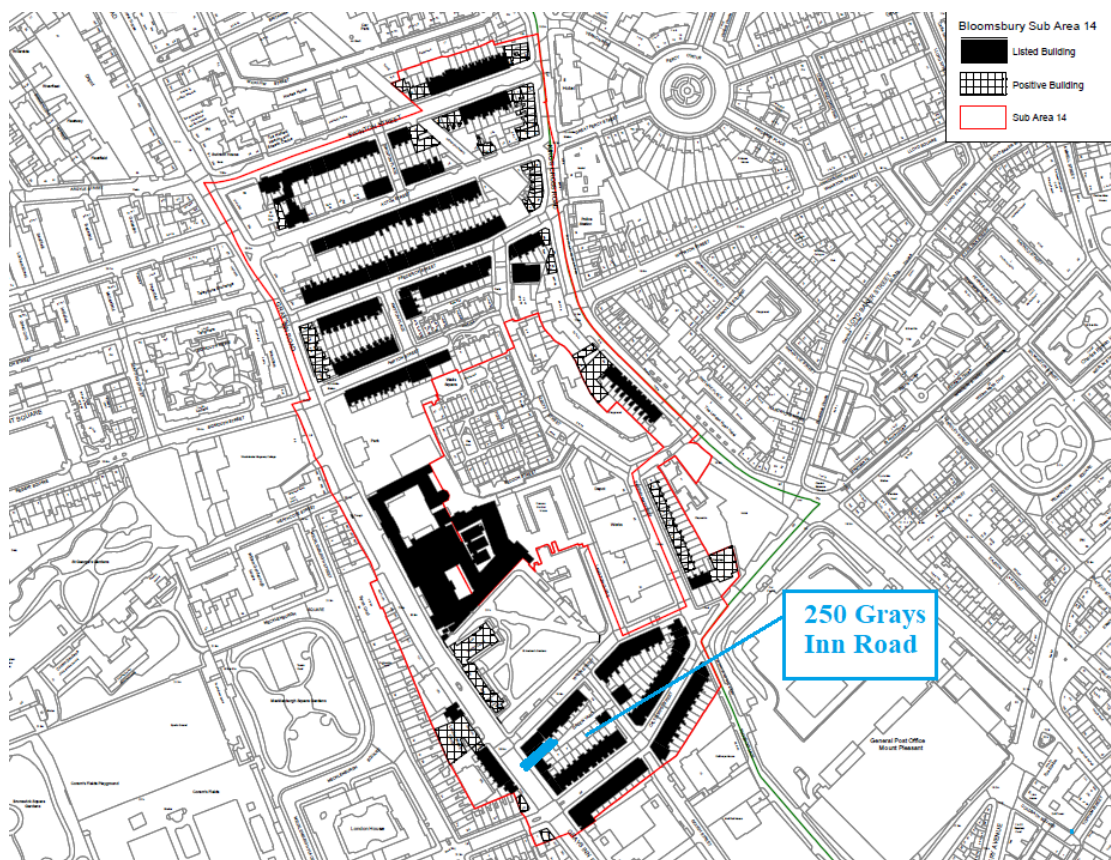


Fig. 2: Bloomsbury Conservation Area Sub Area 14.

4.0 PLANNING LEGISLATION AND POLICIES

- 4.1 As identified in Section 3 the proposed works affect several designated heritage assets, therefore, works which affect the character or the setting of a designated heritage asset should be assessed against the relevant legislation and policies contained in the NPPF and policies contained in the local plan.
- 4.2 The legislative framework for the preservation and enhancement of listed buildings and conservation areas are set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Historic England, defines preservation in this context, as not harming the interest in the building, as opposed to keeping it utterly unchanged.
- 4.3 In 2014, a ruling by the Court of Appeal (Barnwell Manor Wind Energy Ltd v East Northants District Council, English Heritage and the National Trust) made clear that to discharge this responsibility, decision makers must give considerable importance and weight to the desirability of preserving the setting of listed buildings (and by implication other heritage assets) when carrying out the balancing exercise of judging harm against other planning considerations, as required under the National Planning Policy Framework.
- 4.4 Another ruling made in May 2017 by the Court of Appeal (Barwood Strategic Land II LLP v East Staffordshire Borough Council and the Secretary of State for Communities and Local Government), upheld a High Court ruling, that subordinates National Planning Policy Framework development presumptions to the statutory authority of an up-to-date local plan, as the NPPF is no more than ‘guidance for decision-makers, without the force of statute behind it. Paragraph 13 of the decision states, ‘*The NPPF is the Government’s planning policy for England. It does not have the force of statute, and ought not to be treated as if it did. Indeed, as one might expect, it acknowledges and reinforces the statutory presumption in favour of the development plan, and it also explicitly recognizes and emphasizes its own place in the plan-led system of development control. Its “Introduction” acknowledges that “[planning] law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise”, and that “[the NPPF] must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions”. Paragraph 12 recognizes that the NPPF “does not change the statutory status of the development plan as the starting point for decision making”. Paragraph 13 describes the NPPF,*

correctly, as “guidance for local planning authorities and decision-takers”, which, in the context of development control decision-making, is “a material consideration in determining applications”. Paragraph 215, in “Annex 1: Implementation”, says that “due weight should be given to relevant policies in existing plans according to their degree of consistency with [the NPPF] (the closer the policies in the plan to the policies in [the NPPF], the greater the weight that may be given)”, but this too is guidance for decision-makers, without the force of statute behind it’.

- 4.5 Therefore, by implication, this judgment again emphasises the relative importance of sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in making planning decisions in relation to development that affects listed buildings and conservation areas.
- 4.6 As the proposed works affect a listed building and a conservation area’s heritage assets, Sections 16(2) and 72(1) of the above abovementioned Act are relevant to the proposed development. These Sections provide the statutory test against which planning permission affecting designated heritage assets should be assessed by the Local Planning Authority.
- 4.7 Section 16(2) relates to works being carried out to a listed building in context with a Listed Building Consent application and states, *‘In considering whether to grant listed building consent for any works the local planning authority or 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’.*
- 4.8 While Section 72(1) relates to development affecting conservation areas and states, *“In the exercise, with respect to any buildings or other land in a conservation area, of any... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.*
- 4.9 As mentioned above, there is a need to carry out a balancing exercise of judging harm against other planning considerations as required under the NPPF. The NPPF sets out the Government’s planning policies for England and how these are to be applied. The guiding principle of the document is a presumption in favour of sustainable development and the protection and enhancement of the historic environment is embedded in this approach.

- 4.10 Sustainable development is defined as meeting the needs of the present without compromising the needs of the future. Paragraph 8 of the NPPF breaks down this definition into three objectives; economic, social and environmental. Within the environmental objective, sustainable development needs to contribute to *'protecting and enhancing our natural, built and historic environment'*.
- 4.11 Paragraph 20 of the NPPF contains Strategic Policies, which provide an overall strategy for the pattern, scale and quality of development and make sufficient provision for the conservation and enhancement of the natural, built and historic environment.
- 4.12 Section 16 of the NPPF contains policies relating to conserving and enhancing the historic environment. Within this section (paragraph 189), the Local Planning Authority requires the applicant to describe the significance of any affected heritage asset including any contribution made by their setting as part of an application.
- 4.13 Significance is defined in Annex 2 of the NPPF, as the value of a heritage asset to this and future generations because of its archaeological, architectural, artistic or historical interest. Significance also derives not only from the asset's physical presence but also from its setting. Setting of a heritage asset is the surroundings in which the heritage asset is experienced, the extent of which is not fixed and can change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to significance of an asset.
- 4.14 Impact from a proposed development to the significance of a designated heritage asset needs to be evaluated, NPPF paragraph 193, states, *'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'*. NPPF paragraph 194 identifies that alteration, destruction or development within the setting of a designated heritage asset can result in harm to, or loss of, the significance of the asset and that such loss requires a clear and convincing justification. Substantial harm to or loss of a grade II listed building should be exceptional and substantial harm or loss of grade I and grade II* listed buildings should be wholly exceptional.
- 4.15 NPPF Paragraphs 195 and 196 define the levels of harm as substantial or less than

substantial. The National Planning Practice Guidance (NPPG) provides useful guidance on assessing harm in relation to these definitions and gives the following example, 'In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting'. The NPPG quantifies substantial harm (NPPF paragraph 195) as total destruction while partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all. Anything less than total destruction needs to be evaluated on its own merits, for example, the removal of elements to an asset which themselves impact on its significance may therefore not be harmful to the asset. The NPPG advises works that 'are moderate or minor in scale are likely to cause less than substantial harm (NPPF paragraph 196) or no harm at all'. However, it is important to consider each development in its own context as the NPPG also identifies that minor works have the potential to cause substantial harm to the significance of an asset.

4.16 Paragraphs 195 and 196 refer to 'public benefit' as a means to outweigh the loss of or harm to a designated heritage asset. The NPPG identifies that public benefit may follow many developments and as such this benefit could be anything that delivers economic, social or environmental progress which are the dimensions to sustainable development defined by NPPF Paragraph 8. The NPPG states, 'Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefit'. Public benefits may include heritage benefits such as:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- Reducing or removing risk to heritage asset.
- Securing the optimum viable use of a heritage asset in support of its long-term conservation.

4.17 The three points above relate to NPPF Paragraph 192, which requires the Local

Planning Authority to take these points into account when determining applications. Although, there is no defined list of public benefits, examples of public benefit for a designated heritage asset may include:

- The restoration of a listed building.
- The improved setting of a listed building.
- The enhancement of a conservation area.

4.18 As well as legislation and national planning policies relating to the historic environment, The Local Planning Authority (LPA) have relevant policies relating to the historic environment. These local planning policies are contained in the Camden Local Plan adopted in 2017.

4.19 Section 7 of the Plan deals with Design and Heritage and contains the following policies.

Policy D 1 relates to **design** and states that ‘The Council will seek to secure high quality design in development. The Council will require that development – preserves or enhances the historic environment and heritage assets in accordance with Policy D 2 Heritage’.

Policy D 2 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.

Policy D 3 Shopfronts

Protecting existing shopfronts

Shopfronts form an essential part of the character and attractiveness of many areas of Camden, in particular its centres, and contribute to the creation of vibrant streets and public spaces.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss 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.

The Council will not permit development that results in harm that is less than substantial to the significance of a 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, appraisal and management strategies when assessing applications within conservation areas.

The Council will:

- Require that development within the conservation areas, preserves, or where possible, enhances the character or appearance of the area.
- Resist the total or substantial demolition of an unlisted building that makes a possible contribution to the character or appearance of a conservation area.
- Resist development outside of a conservation area that causes harm to the appearance of that conservation area; and
- 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 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:

- resist the total or substantial demolition of a listed building.

- 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
- Resist development that would cause harm to significance of a listed building through an effect on its setting

4.20 Also Relevant to the application are policies contained in the London Plan (adopted 2016). Relevant policies include, 7.4 Local Character and 7.8 Heritage Assets and Archaeology.

Policy 7.4 Local Character

Strategic

- A.** Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

- B.** Buildings, streets and open spaces should provide a high quality design response that:
- a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
 - b contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
 - c is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
 - d allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- is informed by the surrounding historic environment.

Policy 7.8 Heritage Assets and Archaeology

Strategic

- 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.

Planning decisions

- C.** Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D.** Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- E.** New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

5.0 UNDERSTANDING THE HERITAGE

Context

250 Grays inn Road

- 5.1 The listing description (see HS1) identifies Nos.244-250 (even) Grays Inn Road were constructed in the early 19th century. The development was probably speculative development. Historic map regression first shows the development of the eastern side of Greys inn Road between 1824 and 1826 (see Fig. 8).
- 5.2 Grays Inn Road is an historic route running northwards from Holborn to King's Cross, it lies to the eastern side of the extensive Bloomsbury Conservation Area. This area expanded rapidly northwards between 1660 and 1840. Development here took the form of public squares and terraces of town houses built on a grid pattern of streets.
- 5.3 Prior to the Napoleonic Wars much of this development took place to the west of Grays Inn Road. Wilkinson's map of 1795 (Fig. 3) shows development as far north as the Foundling Hospital. The site of 250 Grays Inn Road is shown to be occupied by the original Blue Lion Inn. The area is otherwise undeveloped with the burial ground of St. Andrew's to the north.
- 5.4 Wyld's map of 1824 (Fig. 4) shows development continuing to the west of Grays Inn Road including Mecklenburg, Brunswick and Regent Squares. Today the area includes many listed examples of fine Georgian and Regency town houses. At this time development was planned for the area to the east of the road on the Calthorpe and Swinton estates on land that slopes gently down towards the culverted River Fleet. This development by the Cubitt brothers is of a slightly less formal classicism.
- 5.5 As the 19th century progressed there was industrial development with an armaments factory to the north and a postal telegraph factory to the east near the Mount Pleasant Post Office.
- 5.6 Other commercial activity evolved included shops and public houses that originally formed part of, or were later inserted into, the earlier terraces of town housing, which along with larger public institutions, give the Bloomsbury Conservation Area its characteristic appearance.

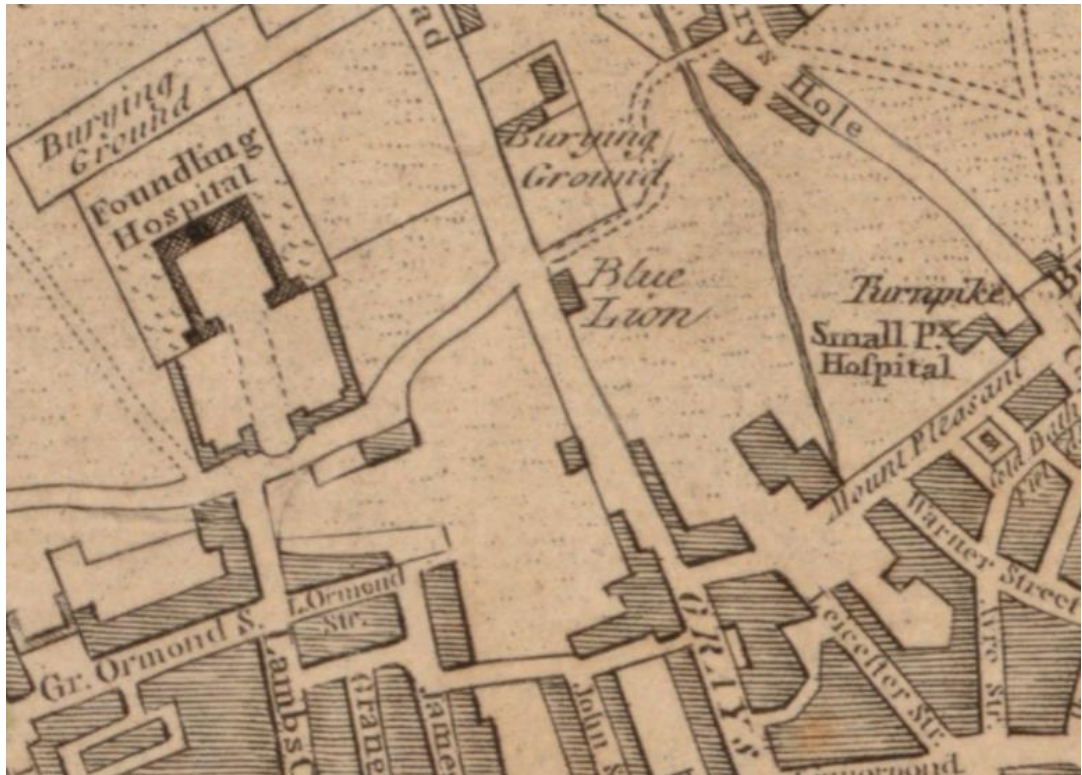


Fig. 3: Extract from Wilkinson's map of 1795

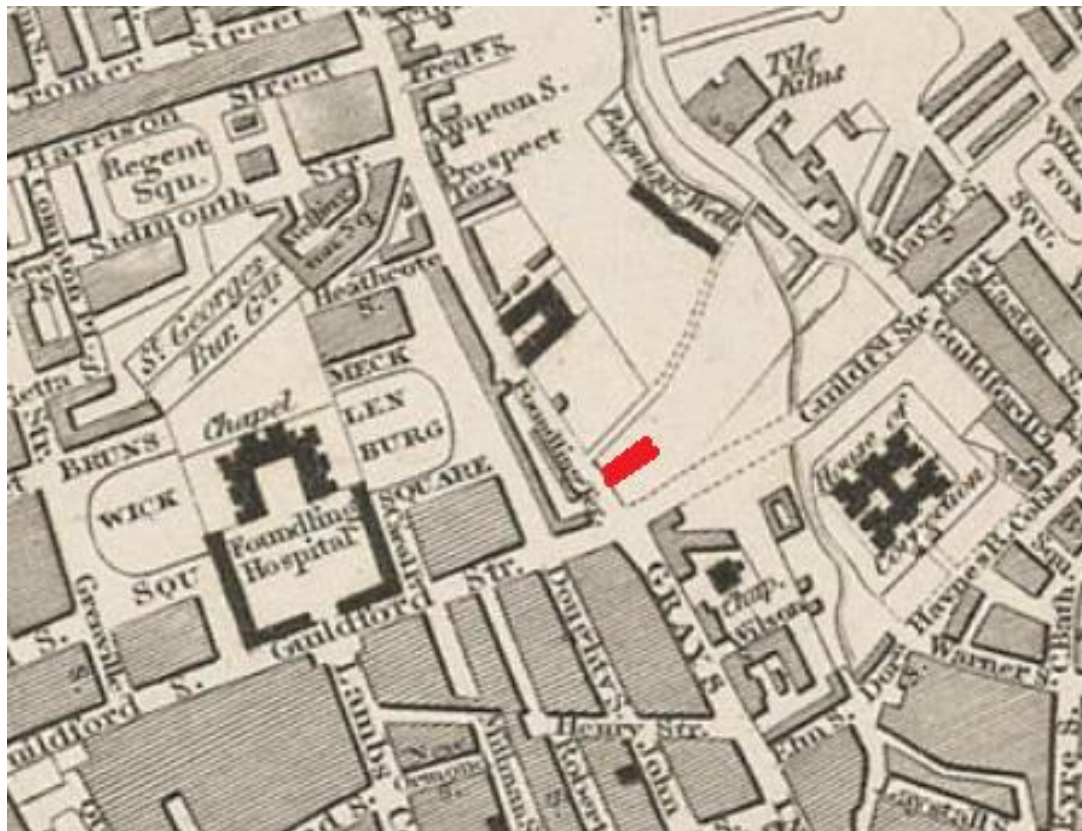


Fig. 4: Extract from Wyld's map of 1824 showing the future site of No. 250

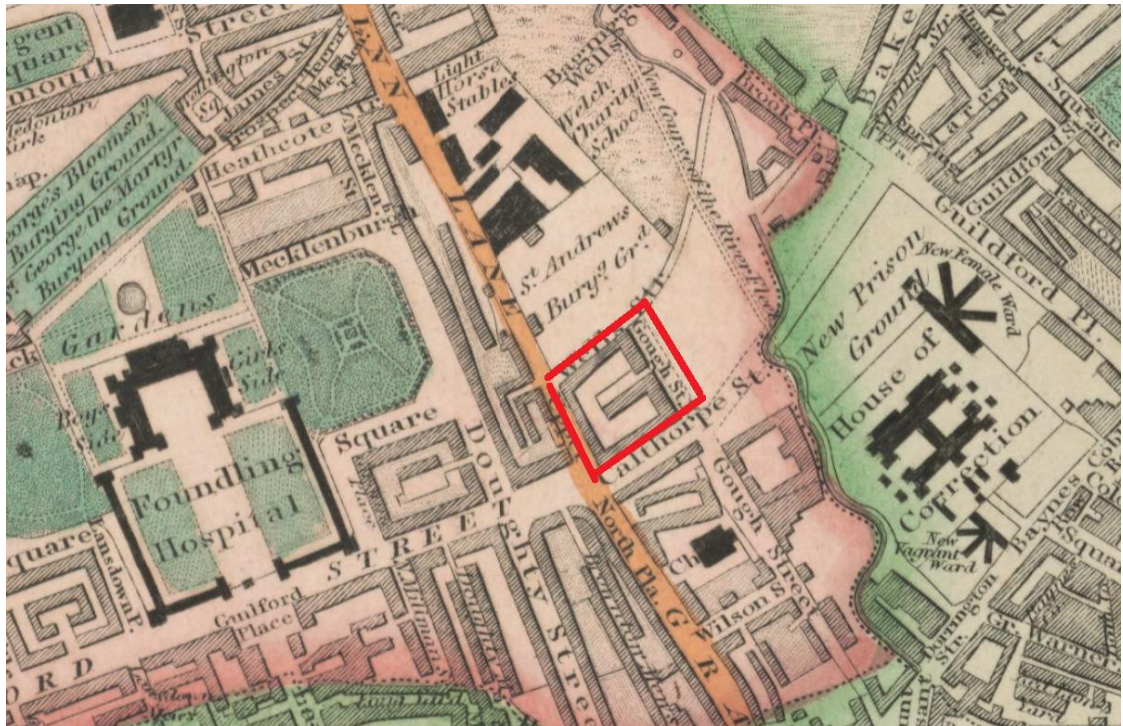


Fig. 5: Extract from Greenwood's map of 1826 showing the new development between Calthorpe and Wells (the original name of Wren St.) Streets.



Fig 6. Extract from 1896 map showing the original layout of 250 Grays Inn Road.



Fig. 7: Ordnance Survey mapping surveyed in 1913 shows the more industrial development to the north-east of the site and the expanding Royal Free Hospital to the north.



Fig. 8: Ordnance Survey map published 1953 shows No. 250 with a partial width rear ground floor extension.

- 5.7 Several properties with historic shopfronts have been listed including No. 242. the shopfront of No.250 is a 20th century one reflecting, possibly, the building's late adaption to retail use. A planning application of 1992 for an external extraction duct suggests use of the property for catering purposes. This is confirmed by documentation relating to the erection of a full width ground floor rear extension in 2009. This extension was subsequently removed and rebuilt to reflect the original part width extension.

Bloomsbury Conservation Area

- 5.8 Bloomsbury Conservation Area was designated in 1968 and initially sought to protect elements of development from the Georgian and earlier eras. Later extensions have reflected a growing appreciation of Victorian and Edwardian and high quality 20th century architecture. Bloomsbury is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area.
- 5.9 Owing to the size and complexity of the Conservation Area, it has been sub-divided into a series of character areas that generally share common characteristics to assist in defining those features that contribute to the area's special interest, including the relevant sub-area here No. 14 that of Calthorpe and Frederick Streets. The latest Appraisal and Management Strategy for the Conservation Area was adopted by Camden Council in 2011 and this was referred to and quoted from for this section.

6.0 ASSESSING SIGNIFICANCE

- 6.1 Significance of a heritage asset is defined by the NPPF as the value of a heritage asset placed on it by current and future generations because of its heritage interest. This interest may be archaeological; architectural; artistic or historical. The setting of a heritage asset also contributes to its significance and is defined by the NPPF as the surrounding in which a heritage asset is experienced. In comparison, Historic England's Conservation Principles (2008) uses evidential; aesthetic; historical and communal values to define significance. These different set of values have been combined for the purpose of this report.
- 6.2 Part 4 of British Standard 7913:2013 *Guide to Conservation of Historic Buildings* provides information on heritage values and significance. In context, this document states, *'A wide range of factors can contribute to the significance of a historic building. As well as physical components, significance includes factors such as immediate and wider setting, use and association (e.g. with a particular event, family, community or artist and those involved in design and construction)'*.
- 6.3 Identifying the values of an asset allow us to understand the degree of significance and inform us of the potential impact the proposed works will have the heritage asset and its setting. These values may be tangible, the physical fabric of the building, capable of being touched, or view such as its landscape. Also, the value may be intangible through a past event or an association with a person.
- **Evidential (archaeological) value** relates to physical aspects of the site which provide evidence from the past. This can be with built form or below ground archaeology.
 - **Historical value** is the extent to which the asset is associated with or illustrative of historic events or people.
 - **Aesthetic (architectural/artistic) value** includes design, visual, landscape and architectural qualities.
 - **Communal value** includes social, commemorative or spiritual value, local identity and the meaning of place for people.
- 6.4 The assessment of significance draws upon information contained in the section on Understanding the Heritage and uses the values defined above to establish the level of significance detailed below:

- Features of the asset which contribute to the principal historical and architectural interest are considered to be of **high significance**.
- Features of the asset which noticeably contribute to the overall architectural or historical Interest and may include post construction features of historic or design interest are considered to be of **medium significance**.
- Features of the asset which make a relatively minor contribution to the historic and architectural interest are considered to be of **low significance**.
- Features which do not contribute to the historic and architectural interest of the asset, and in some cases may even detract from the significance are therefore considered to be either **neutral or detracting**.

Assessing Setting

- 6.5 The primary guiding document for assessing setting is *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (2017)*, produced by Historic England is the primary guiding document for assessing setting.
- 6.6 Setting varies from asset to asset and cannot be generically defined. Changes to the setting of heritage assets may be positive such as replacing poor development which has compromised the assets setting. It is likely that the setting of an asset has changed over time from the dynamics of human activity and natural occurrences such as weather.
- 6.7 The importance setting makes to the contribution to the significance of the heritage asset is often related to how the heritage asset is seen in views. This can include views looking towards the heritage asset or from the heritage asset looking outwards and may include relationships between the asset and other heritage assets, natural or topographical features. Assets may also be intended to be seen from one another in designed landscapes for aesthetic reasons.
- 6.8 Historic England's Good Practice Advice 3, *The Setting of Heritage Assets (2017)*, notes a staged approach to proportionate decision-taking, with relevant NPPF paragraphs along with guidance contained in the National Planning Practice Guidance (NPPG) for their implementation, providing the framework for the consideration of changes affecting the setting of heritage assets which should be

assessed proportionately and based on the nature, extent and level of the heritage asset's significance.

6.9 The Guidance recommends a five-step approach to the assessment of the effect of development on the setting of heritage assets as follows:

- *Step 1:* identify which heritage assets and their settings are affected;
- *Step 2:* assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- *Step 3:* assess the effects of the proposed development whether beneficial or harmful, on that significance;
- *Step 4:* explore ways of maximising enhancement and avoiding or minimising harm;
- *Step 5:* make and document the decision and monitor outcomes.

Assessing Impact

6.10 In order to assess and quantify the level harm to the significance of a heritage asset in context with the relevant Paragraphs in the NPPF, the NPPG, a web-based resource provides up-to-date guidance on NPPF policies. The NPPG provides useful guidance on assessing harm in relation to Paragraphs 193 and 194 of the NPPF. The NPPG states, *'in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting'*.

6.11 In defining what constitutes substantial harm, the NPPG identifies that the impact of total destruction is obviously substantial harm while partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all. Anything less than total destruction needs to be evaluated on its own merits, for example, the removal of elements to an asset which themselves impact on its significance may therefore not be harmful to the asset.

- 6.12 The NPPG advises works that '*are moderate or minor in scale are likely to cause less than substantial harm or no harm at all*'. However, it is important to consider each development in its own context as the NPPG identifies that minor works have the potential to cause substantial harm to the significance of an asset. This would be so if for example the works removed an element which contributed to the asset's special architectural or historic interest.

Significance of 250 Grays Road

- 6.13 To a certain extent the significance of the listed building has already been recognised by its inclusion on the National Heritage List for England (NHLE). Historic England define grade II listed buildings as buildings of special interest.
- 6.14 The following part of this section examines the values of the building under the four bulleted headings detailed in paragraph 6.3.

Evidential (archaeological) value

- 6.15 The property contributes to the overall structure as 250 Grays Road is part of an early 19th century terrace of townhouses constructed as part of the area's transformation from a rural landscape to a suburban enclave of London for professional and management classes. The listing description states the building dates from the early 19th century. This is confirmed by historic map regression, which shows the terrace dates to c. 1825. Therefore, the building provides evidence of early 19th century construction methods, fabric and architectural style.

Historical value

- 6.16 The historic value of the building is derived from its survival as part of an early 19th century residential development of townhouses to accommodate the growth in population. The building provides evidence of the area's prosperity and a change from rural to suburban.

Aesthetic (architectural/artistic) value

- 6.17 Aesthetically, the value of the building is its architectural character executed with stock brick. The fenestration is typical with large recessed sashes to the first floor and smaller ones to the upper. The roof is defined by a parapet contributing to the area's strong and consistent roof lines. The building is typical in character and form for its construction period.

Communal Value

- 6.18 The property has communal value in relation to the conservation area and as part of the area's historical and architectural development. Therefore, the building contributes to a sense of place, the social, domestic and architectural history of area.

Setting

- 6.19 The setting of the building is defined by the surrounding developments constructed in situ with No.250 as part of a planned development of townhouses. The property also contributes to the streetscape character of Grays Inn Road.

Overview

- 6.20 The significance of 250 Grays Inn Road is defined by its architectural character, which is retained to the to its main elevation above the inserted shopfront. The rear elevation of the property has been altered at ground floor level. Those alterations were amended in such a way as to preserve the special character of the grade II listed building and the character and appearance of the wider conservation area in 2009.

Level of Significance

- 6.21 The significance of the main elevation is considered to be of **high significance**. The rear elevation is considered to be of **medium significance** as whilst the alterations have been carried out in such a way as to retain the elevation's form and character the extension is post construction.
- 6.22 The setting of 250 Grays Inn Road is formed by the neighbouring properties, which form the historic streetscape. The setting of the building is considered to be of **high significance** as it forms part of the character area of Calthorpe and Frederick Streets.

Significance Bloomsbury Conservation Area

- 6.23 The significance of the conservation area is derived from its historical development formed by 19th century town planning comprising of speculative residential developments characterised by long rows of planned streets and public squares.
- 6.24 The conservation area documents the expansion of London's population in relation to the classes these developments were aimed at.
- 6.25 The character of the conservation area also reflects the evolution of the area with the introduction of large public institutions and development along major thoroughfares. The plan form, construction materials and architectural styles contribute the evolution and character of the conservation area.

7.0 PROPOSED WORKS AND ASSESSMENT

Outline of Works

- 7.1 The works include the renewal of the rear ground floor extension glazed roof which is in poor condition and allowing water ingress into the ground floor retail unit.
- 7.2 The works also include the redecoration of the ground floor shopfront the paintwork of which is in poor and deteriorating condition.
- 7.3 The staircase leading to the lower ground floor is in much need of replacement treads due to the in situ one being of a poor and dangerous state rendering the staircase a hazard.

Assessment of Impact

- 7.4 The works are to replace the existing glazed roof which was constructed in 2009 to address issues following the creation of a full width ground floor extension with a flat roof that raised design concerns. After consultations with the Council's Urban Design Officer the current roof structure was constructed in such a way as to 'allow the original rear extension to still be recognised and appreciated' and to therefore 'preserve the special character of the listed building'. The works merely replace glazed roof units that have reached the end of their design life. Adjacent parapet works and roof coverings will not be affected. Therefore, the works will not impact on historic fabric or harm the special interests for which the building is listed.
- 7.5 The staircase has been repaired previously which has been inadequate therefore, it is proposed to replace the treads to the staircase, which is deemed a pragmatic solution and necessary repair to the staircase leading from the ground floor to the lower ground floor. The current condition of presents a clear health and safety risk to both patrons and staff using the staircase. This work retains the majority of the staircase, which it is not clear whether this staircase is contemporary to the construction of the building or a later replacement.
- 7.6 The redecoration of the existing shopfront is to renew the painted finishes to help preserve the timberwork from rot and decay. The shopfront is considered to date to the 20th century and therefore the works will not impact on historic fabric or harm the special interests for which the building is listed. Whilst the shopfront is considered to be a 20th century insertion it does contribute to the vibrant street scene and public space and its redecoration allows its retention in line with Policy D3 of the Local Plan.

8.0 JUSTIFICATION

- 8.1 Paragraph 190 of the National Planning Policy Framework (2018) advises Local Planning Authorities that the particular significance, including setting of any heritage asset is assessed. This document has concisely described the heritage asset affected by the proposed works and assessed the significance of the designated heritage asset.
- 8.2 The purpose of the works is to retain the use of the property as a retail catering space. The works will not harm the significance of the identified heritage assets as the spaces affected are post construction additions.
- 8.3 With regards to the development meeting the statutory test provided by Sections 16(2) (Listed Buildings and Conservation Areas) Act 1990, the minimum aim is to preserve the setting; building; features of special architectural or historic interest of a listed building. While the test provided by and 72(1) of the Act, requires as a minimum for development to preserve the character or appearance of a conservation area.
- 8.4 The works are considered to meet the tests provided by the Planning (listed Buildings and Conservation Areas) Act 1990 as the works will preserve the character and setting of the listed building and any features identified in this report, which are of special architectural or historic interest. The proposed works also preserve the character and appearance of the conservation areas and the setting of neighbouring listed buildings, which form the listing for group value.
- 8.5 It should be remembered that Historic England defines preservation in this context as not harming the interest in the building, as opposed to keeping it utterly unchanged.
- 8.6 With regards the test provided by paragraphs 195-196 of the NPPF, the NPPG provides the following useful example:

'In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting'.

8.7 It has been identified within this Heritage Statement that the proposed works will not harm the setting of the listed building or the character of the conservation area. It is considered the works do not need public benefit as there is no requirement to overcome harm to the heritage assets.

However, it is considered that the works add to public benefit. Paragraphs 195 and 196 of the NPPF refer to 'public benefit' as a means to outweigh the loss of or harm to a designated heritage asset. The NPPG identifies that public benefit may follow many developments and as such this benefit could be anything that delivers economic, social or environmental progress which are the dimensions to sustainable development defined by NPPF Paragraph 8. The NPPG states Public benefits may include heritage benefits such as:

- Securing the optimum viable use of a heritage asset in support of its long-term conservation.

8.8 It is considered, in this instance that the proposed works facilitate the continued use of the heritage asset as a commercial unit and therefore its sustainable future.

8.9 With regards to local planning policies, the proposed development would conserve the setting of the heritage assets as justified above.

8.10 It is concluded, the proposed works preserve the significance and setting of the heritage assets identified within this report. The proposal would satisfy the requirements for sufficient justification under the relevant *sections of the Planning* (Listed Buildings and Conservation Areas) Act 1990, relevant policies of the National Planning Policy Framework (2019), relevant local plan policies and those relevant in the London Plan (2015)

9.0 SOURCES

Ministry of Housing, Communities & Local Government (2018), *National Planning Policy Framework*.

Planning (Listed Buildings and Conservation Area) Act 1990

National Heritage List for England.

Ordnance Survey Maps (various dates)

Department for Communities & Local Government (2018)

<http://planningguidance.communities.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/>

Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (Second Edition)*

Historic England (2008) *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

The London Plan (2016)

Camden Local Plan (2017)

HS1

Listing Descriptions

Listing Address: 244-250 GRAYS INN ROAD
List Entry Number: 1113129
County: Greater London Authority
District: London Borough of Camden
Parish: N/A
Grade: II
Date first listed: 14 May 1974
Date listing amended: N/A
National Grid Ref: TQ 30792 82329
Details:

TQ3082SE GRAY'S INN ROAD 798-1/96/652 (East side) 14/05/74 Nos.244-250 (Even)

GV II

Terrace of 4 houses with shops. Early C19. Yellow stock brick; Nos 246 & 248 refronted. 3 storeys and cellars. 2 windows each. No.244, early C19 wooden shopfront with arched centre window between half columns (originally fluted) with ornamented capitals carrying the remains of a simplified entablature (frieze rotted away and dilapidated cornice). Doorways with remains of pilasters; square-headed shop doorway with overlight and part glazed door; round-arched house doorway with fanlight and panelled door. No.246, mid C19 shopfront, altered; entablature with dentil cornice and right hand console. No.248, wooden shopfront, altered, with splayed shop window; patterned metal grille to fanlight of doorway. No.250, C20 shopfront. Upper floors with gauged brick flat arches (except No.246 with roughcast lintels) to recessed sashes, most with glazing bars; No.244 with cast-iron balconies to 1st floor windows. Parapets. INTERIORS: not inspected. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: -1952: 58).