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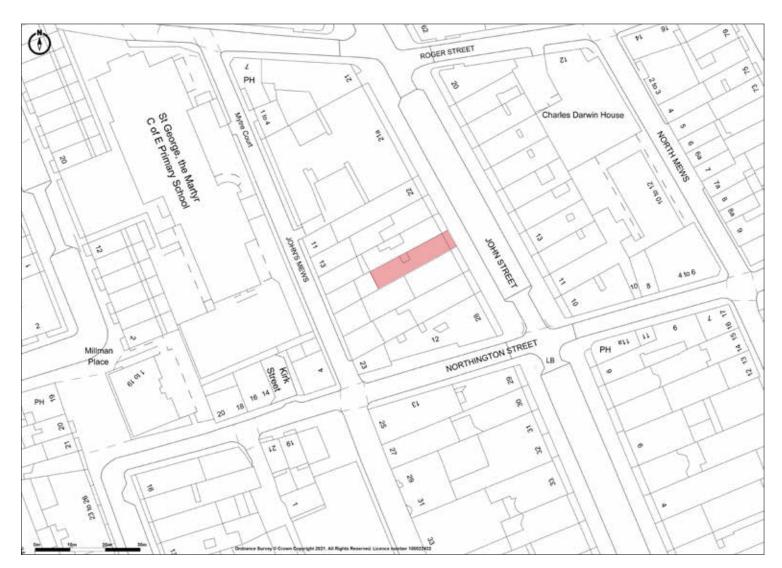
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Ordnance Survey map reproduced under Licence 100020449

1.0 Summary of Historic Building Report

1.1 Introduction

Donald Insall Associates was commissioned in February 2020 to assist with design proposals for 25 John Street London, WC1N 2BS.

The investigation has comprised historical research, using both archival and secondary material, and a site inspection. A brief illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3. The investigation has established the significance of the building, which is set out in Section 4 and summarised below.

The specific constraints for this building are summarised below. This report has been drafted to inform the design of proposals for the building, by Donald Insall Associates, so that they comply with these requirements. Section 5 provides a justification of the scheme according to the relevant legislation, planning policy and guidance.

1.2 The Building and its Legal Status and Policy Context

Nos. 25 John Street lies within the Bloomsbury Conservation Area in the London Borough of Camden. 25 John Street is listed at Grade II and is identified as having 'group value' with the neighbouring terrace buildings. The building is identified in the Bloomsbury Conservation Area Appraisal and Management Strategy as a 'positive contributor' (p. 143). Alterations to a listed building generally require listed building consent; development in conservation areas or within

the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I and a summary of guidance on the Bloomsbury Conservation Area provided by the local planning authority is in Appendix II, along with extracts from the relevant legislation and planning policy documents.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have 'special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses' and, in respect of conservation areas, that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the site comprises the Camden Local Plan (2017), and the London Plan (March 2021). The Camden Local Plan (2017) has policies that deal with development affecting the historic environment. Policy D1 Design asks that such development 'respects local context and character' and 'preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage'. Policy D2 states that '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'. Regarding listed buildings, Policy D2 Heritage states that the Council will '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', as well as 'resist development that would cause harm to significance of a listed building through an effect on its setting'.

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework 2021 will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). The key message of the NPPF is the concept of 'sustainable development' which for the historic environment means that heritage assets 'should be conserved in a manner appropriate to their significance'.

The NPPF recognises that, in some cases, the significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its

setting. The NPPF therefore states that any harm or loss to a designated heritage asset 'should require clear and convincing justification' and that any 'less than substantial' harm caused to the significance of a designated heritage asset should be weighed against the benefits of the proposal including, where appropriate, securing its optimum viable use. A designated heritage asset is defined as a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.

1.3 Summary Assessment of Significance

A more detailed summary of significance is provided in **Section 4** of this report. 25 John Street is of special interest as an example of an early-19th century townhouse. Its principal architectural significance lies in its external appearance and contribution to the listed terrace, the wider street scene and the conservation area; elements of particular note are the building's façade proportions, the composition and hierarchy of the window openings and its original double pitched roof.

The interior plan form has been largely preserved and is of significance, particularly on the principal floors. The original hierarchy of floor levels (and their different status) is still evident in terms of the varied storey heights and some of the surviving decorative features. The principal timber staircase is of high significance, as are some early-19th century chimney pieces, decorative architraves and doors, sash windows and some original cornices where they remain.

1.4 Summary of Proposals and Justification

The proposals are set out in the drawings prepared by Donald Insall Associates, which this Historic Building Report accompanies and are analysed in detail in **Section 5** of this report. The proposals are minor in nature, and would see the removal of modern fabric in association with the proposed change of use from an office to a residential dwelling. Where possible, original plan form would be reinstated and appropriate traditional fixtures and fittings reinstated.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their setting and conservation areas, and to have special regard to the desirability of preserving the special architectural or historic interest of listed buildings and preserving or enhancing the character or appearance of a conservation area.

The National Planning Policy Framework (NPPF 2021) has crystallised previous policy approaches to the historic environment. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development and it emphasises the need to take account of the pros and cons of any proposal to alter and adapt buildings of 'special' architectural and historical interest.

For the reasons outlined in Section 5 of this report, it is considered that the proposals would preserve the special interest of the Grade II-listed building and preserve the character and appearance of the Bloomsbury Conservation Area. As the proposals would not cause any harm to the significance of any of the relevant designated heritage assets paragraphs 201 and 202 of the NPPF, relating to the assessment of harm to heritage assets, are not engaged.

Therefore the proposals comply with the relevant policies of the National Planning Policy Framework, including the requirement in paragraph 189 to conserve heritage assets 'in a manner appropriate to their significance', and with relevant local policies in heritage terms including specifically policies D1 and D2 of the Camden Local Plan (2017) and Policy HC1 of the London Plan, and are, therefore, considered to be acceptable in heritage terms.

2.0 Historical Background

2.1 Area History

2.1.1 The Early Development of Holborn

Holborn takes its name from 'Holbourne', given to the part of the River Fleet running down to the Thames along the valley west of the City. Large suburban houses were built along Holborn from the Middle Ages, a number of them becoming lawyer's colleges, whilst land to the north of Holborn remained open countryside. In 1294, Sir Reginald de Grey, justiciar of Cheshire leased a manor house here from the Dean and Chapter of St Paul's. This became an Inn of Court in the second half of the 14th century and by the mid-16th century consisted of a single courtyard and walled garden surrounded by farmland. The road to the east of the Inn was later named 'Graies Inn Lane' - as shown in the Augustine Ryther's Map of the Cittie of London (1633) [plate 2.1]. Graies or Gray's Inn Lane was renamed Gray's Inn Road in the mid-19th century.

The surrounding area was subsequently developed, taking its lead from Covent Garden, with good quality, large houses which were inhabited by the gentry.² William Morgan's 1682 *Map of London* shows the dense arrangement of streets and buildings between Gray's Inn Road and Hatton Gardens to the east **[plate 2.2]**. To the west, Bloomsbury followed the fashionable approach of introducing formal squares and grid patterned streets, exemplified by Red Lion Square and Queen Square, designed by the speculator Nicholas Barbon in the 1680s.

2.1.2 18th and Early-19th Century Residential Development

Gray's Inn Road was developed with a series of terraced houses in the early-18th century; those on the west side had formal gardens and mews properties to the rear, whilst those on the east appear to have been more modest and were constrained by earlier development. To the northwest of Gray's Inn Road was the Foundling Hospital and its grounds, laid out on open land in 1742 (now Coram's Fields). Horwood's Plan of the Cities of London and Westminster the Borough of Southwark, and parts adjoining Shewing every House (1792-99) shows Gray's Inn Road fully developed up to and a little beyond the parish boundary around Elm Street, the Foundling Hospital, and beyond open ground and farmland [plate 2.3].

At the end of the 18th century, land owned by the Dukes of Bedford was developed to form Brunswick and Mecklenburgh Squares to designs by S.P. Cockerell, whilst nearby grids of streets were planned by James Burton.³ Wren Street and Calthorpe Street to the north of Gray's Inn Road were planned by the Cubitt Brothers in 1816 and developed in 1850, expanding across previously undeveloped land. John Street was laid out earlier from the south as a wide thoroughfare, and built up in 1756-9 by carpenter John Blagrove (its early phases are visible in Horwood's map, plate 2.3). Pevsner describes it as 'a good demonstration of the mid C18, in contrast to earlier streets to the west', due to its employment of yellow stock brick, a number of Iconic doorcases and other good-quality decorative details.4

¹ Pevsner and Cherry, 2002, p. 249.

² London Borough of Camden, 2011.

³ Ibid

⁴ Pevsner and Cherry, 2002, p. 311.



2.1 Augstine Ryther's Map of the Cittie of London, 1633 (British Library)



2.2 Morgan's Map of the Whole of London, 1682 (British History Online)



2.3 Horwood's Plan of the Cities of London and Westminster, 1792-99, John Street marked in red (British Library)

2.1.3 Victorian Industry and 'Improvement'

The status and character of the area declined during the 19th century, when it became fashionable to move to the West End, Belgravia or Knightsbridge. Its houses, subsequently devoid of their wealthy inhabitants, were often adapted to light industrial uses with basement workshops, ground-floor shops and living quarters above, as well as for office use.

During the second half of the 19th century, the area was transformed through a series of Metropolitan Board of Works schemes which sought to clear slums and improve connectivity. Between 1841 and 1856, the River Fleet was culverted and Farringdon Road was constructed over it. In 1863, Holborn Road was widened and the Holborn Viaduct was constructed to the south of Chancery Lane. In 1874-78, Clerkenwell Road/Theobald's Road was laid out, creating an arterial road linking the West and East ends. Slums to the north were cleared, displacing 1,445 people, to create tree-lined Rosebery Avenue in 1887-92. Gray's Inn Road was widened in the 1880s, which involved the demolition of buildings along its east side. Part of the statutory requirement of slum clearance was the provision of new housing, supposedly for displaced residents, resulting in the development of the east side of Gray's Inn Road and the surrounding area with late-19th century mansion blocks and tenements. The breadth of this wide scale redevelopment can be seen in the Ordnance Survey map of 1896 [plate 2.4].

2.1.4 20th-Century Modernisation: Industry, Housing and Infrastructure

The beginning of the 20th century saw the industrial, commercial and infrastructural development of the area. In 1900, The London County Tramways (Electrical Power) Act allowed the replacement of horse-drawn trams with electrical tramway lines, and soon after a tramline was laid along Gray's Inn Road linking to wider Holborn. The commercial development of the area quickly gathered pace alongside such transport improvements, with more ground floors of terraced houses converted for shop and office use, and purpose-built premises becoming more commonplace.

As the area's uses continued to shift, a number of Holborn's terraces were lost during the interwar period, when many were demolished and their plots amalgamated for industrial use. At this time, the local cityscape largely comprised wide arterial roads fronted by a mixture of mansion blocks, narrow terrace houses and municipal buildings, with industrial complexes laid out on irregular plots dominating the hinterlands.

Holborn suffered extensively during the Second World War, when approximately one-seventh of its buildings were destroyed. The *London County Council Bomb Damage Maps 1939-1945* show the extent of damage caused to the buildings surrounding Gray's Inn to the

east, west and south (the colour black indicating total destruction); to the north, John Street and John's Mews endured some total losses and blast damage in their southernmost blocks, as well as the ultimate loss of an early-19th century Baptist chapel located in the northwest section of the street, eventually replaced by a large, post-war brick office building [plate 2.5]. This consequently led to a good deal of piecemeal postwar redevelopment throughout the area, including the construction of municipal housing estates and the development of large office blocks, the latter often by renowned architects, such as The New Printing House Square for The Times by Richard Seifert and Partners (1972-6) and 200 Gray's Inn Road (1989-92), which was Foster and Partners' first major commercial building in London.



2.4 Ordnance Survey map, 1896 (National Library of Scotland)



2.5 London County Council's Bomb Damage Map of London 1939-1945 (Ward 2015)

2.2 The Building: 25 John Street

According to map evidence, 25 John Street was erected between 1800 and 1819 as part of a range of terraced houses along the street's west side. The house first appears in Horwood's map of 1819 without a mews, but it is likely that the latter was erected soon afterward.

2.2.1 19th Century Subdivision

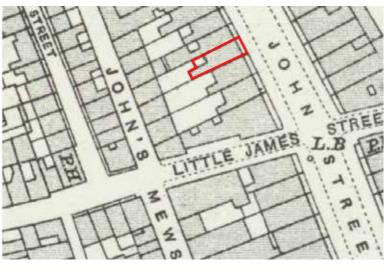
No early architectural plans or records are currently available for 25 John Street, though lease records for the building on file at Camden Local Studies and Archives show that the building was subdivided and let as offices (possibly with a mix of flats) most likely from 1888, or from 1898 at the latest. The ground floor was let on a multi-year lease from this time, whilst the basement, first, second and third floors were let to individual tenants on a quarterly basis. Messrs. J.W.A. Calkin and S.J.P. Calkin let the ground and first floors to Clarke, Calkin & Son, solicitors, from September 1901; the lease agreement from that year states that both floors comprised a front room and back room, with a lavatory on the staircase landing. Messrs. Calkin were still listed as landlords in 1921 when they let the second floor of the house to a Mr. Walter B. Sloan as offices, though it is noted that J.W.A. Calkin died in 1925, and left his interest in the lease of 25 John Street to S.J.P. Calkin, his son.

2.2.2 Late-19th to Late-20th Century Map Regression

In addition to lease records, an analysis of map regression provides more information regarding changes to the property from the late-19th to mid-20th century. The Ordnance Survey map of 1894-96 illustrates the footprint of the main house and mews at the end of the 19th century [plate 2.6]. This shows the house set back from John Street behind a front lightwell and stepped entrance. It had already been extended to the rear by this time, as evidenced by the particularly long closet wing along the south side of the plot, and an additional smaller extension to the rear of the remaining rear elevation with a basement lightwell behind it. The building's mews to the southwest retained its simple and likely original rectangular footprint. The smaller rear wing to the north appears to have been demolished by the time of the 1915 Ordnance Survey, though this could have simply been omitted from the plan [plate 2.7].

This section of John Street survived wartime relatively unscathed according to London County Council Bomb Damage Maps (see plate 2.5). By 1953, the main house had a similar footprint to that shown in 1915, although an indentation is shown in the north wall of the rear wing, indicating that there were two adjoining structures of differing widths [plate 2.8]; the mews retained its original footprint by this time. However, considerable later alterations occurred to the rear of the main house, as the 1998 Ordnance Survey shows an extension the full width of the plot, with only a small lightwell retained to the north [plate 2.9]. These changes are described in more detail in Section 2.2.3 below.





- **2.6** Ordnance Survey map, 1896 (National Library of Scotland).jpg left
- **2.7** 25 John Street 1915 Ordnance Survey (National Library of Scotland) right





- **2.8** 25 John Street 1953 Ordnance Survey (National Library of Scotland) left
- **2.9** 25 John Street 1998 Ordnance Survey (Camden Planning) right

2.2.3 Mid/Late 20th-Century Alterations

The earliest floor plans available for 25 John Street date from the early/mid 1970s, and show that the house was in mixed office and residential use at this time. A 1972 existing basement plan shows that stairs led down from street level into a front lightwell, which in turn accessed two below-pavement vaults [plate 2.10]. The southern section of the lightwell had been enclosed as a tea point, while a door to the north of this led into a full-width front room; an annotation indicates that the fireplaces at this level were to be removed. A wine vault separated the front room from a smaller rear room, opposite which a staircase led up along the south wall to the ground floor. A window looked out from the rear room on to a square lightwell with a staircase along its northern side, while a doorway south of the window led into a rear wing with a chimneybreast along the south wall; it was proposed to extend a rear vault at the time to accommodate three new WCs.

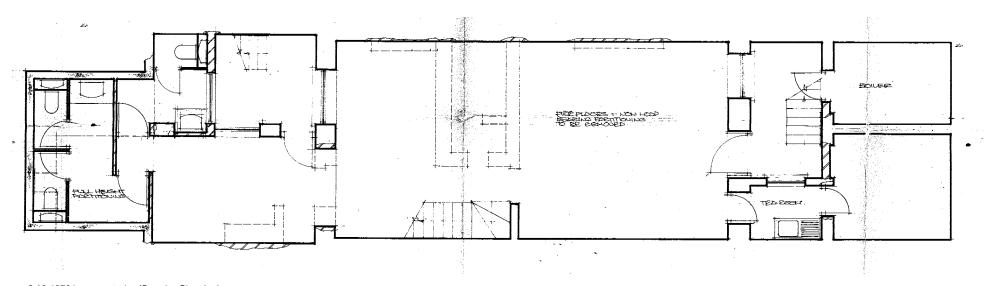
However, a set of floor plans forming part of a 1975 application for the house's use as offices at the basement through first floor with a flat above indicate that these previously consented changes to the basement level were not executed, as chimneybreasts still remained and the rear vault had not been extended [plate 2.11]. The ground floor retained a good deal of its historic front-to-back plan form in 1975, comprising a front room of two bays and a rear room of one bay, each with chimneybreasts along the north party wall and its own entrance from the hall, though a doubledoor opening had been made in the partition between the front and rear rooms by this point in time. The hall led from a small entrance vestibule past the principal

staircase along the south wall and through an opening in the rear wall which led into the rear wing. The latter comprised a reception room with chimneybreast along the south wall and north-facing window, and a smaller rear room with an east-facing window.

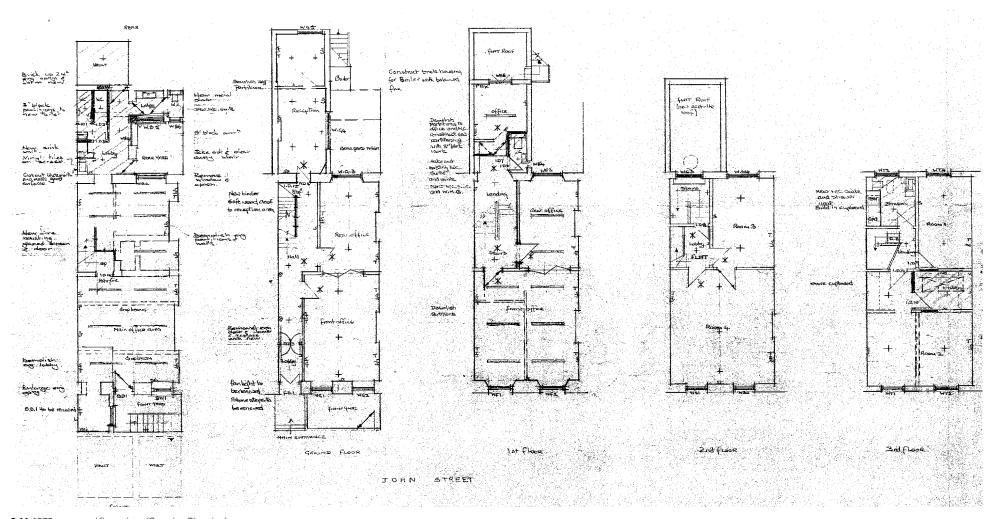
The first floor was also in use as offices in 1975, and comprised two front rooms (the original front room subdivided by later partitions) and a rear room. Chimneybreasts also remained at this point in time to the front and rear along the north party wall, and a double-door opening had been made in the partition between the front and rear rooms; both rooms were lit by fluorescent strip lighting. A short flight of steps led up to the first-floor half-landing, which provided access to the rear wing; the latter comprised a small WC (proposed to be removed in 1975) and a single office with doors that led out onto the flat roof of the east end of the ground floor extension. A separate flight of exterior stairs led from the roof down to the ground floor.

The second floor included the entrance to the flat, where a small partition was inserted to create a lobby at the stair landing, and a window lit the stairwell from the west. Otherwise the floor comprised a full-width, two-bay front room with a chimneybreast along the north wall and single-door entrances from the landing lobby and rear room. The smaller rear room was the same in plan to that below, except its chimneybreast was removed by 1975. A secondary staircase continued to the third floor, which was also contained within the flat. To the rear this level comprised a bathroom in the southwest corner and a rear bedroom in the northwest corner, each with single

windows facing west. A small kitchen was located at the centre of the floor; annotations indicate that a rooflight was to be added here as part of the 1975 proposals, and partitions and sliding doors were to be removed, in addition to the blocking up of the doors between the kitchen and the front and rear rooms to either side. The front of the second floor was divided into two rooms of one bay each in 1975, though it was proposed at the time to demolish the partition between these two rooms. Chimneybreasts at this level also appear to have already been removed at the time of the application.



2.10 1972 basement plan (Camden Planning)



2.11 1975 proposed floor plans (Camden Planning)

Externally, an early/mid-20th-century photograph of the principal brick elevations of 25 John Street and the adjoining no. 24 illustrates how the pair was narrower - each being only two bays wide - and slightly shorter than the neighbouring houses to the south [plate 2.12]. No. 25 (at the centre of the photograph) was set back behind a lightwell protected by spear-headed iron railings, with a recessed front entrance door below a large overlight and two six-over-six sash windows at ground-floor-level. Six-over-six sashes were set behind cast iron balconettes at the first floor, as were two later two-over-two sash windows at the second floor. The third floor sashes were both three-overthree, and all windows were set below brick lintels. A string course beneath the first floor continued across both nos. 24 and 25, accentuating their uniformity (other than an additional window which had been inserted at the second floor level of no. 24).

A photograph of the rear elevation taken in 1975 illustrates the alterations that had already occurred by this time, including the two-storey brick rear wing with a flat-roofed, single-storey extension with modern glazed doors, timber garden staircase and a handrail forming the terrace area at the first floor level [plate 2.13]. Apart from these interventions and the addition of numerous service pipes, however, the rear of the house appears to have remained relatively intact and with much of its original multi-paned fenestration. A 1973 photograph of the interior of the

rear extension provides a view of some of its features at the ground floor level, including what appears to be 19th-century panelling along the rear wall, the chimneybreast along the south side (depicted in plan in plate 2.11), and a broad window which faced north **[plate 2.14]**. Additional photographs documenting the 1970s interiors of the house are on file at the London Metropolitan Archives, but were not accessible due to visitor restrictions at the time of writing; the reference codes for these items have been included in Section 2.4 of this report.



2.12 25 John Street (at centre) in the early-mid-20th century (Camden Local Studies & Archives)



2.13 Rear elevation of 25 John Street, 1975 (London Metropolitan Archives)



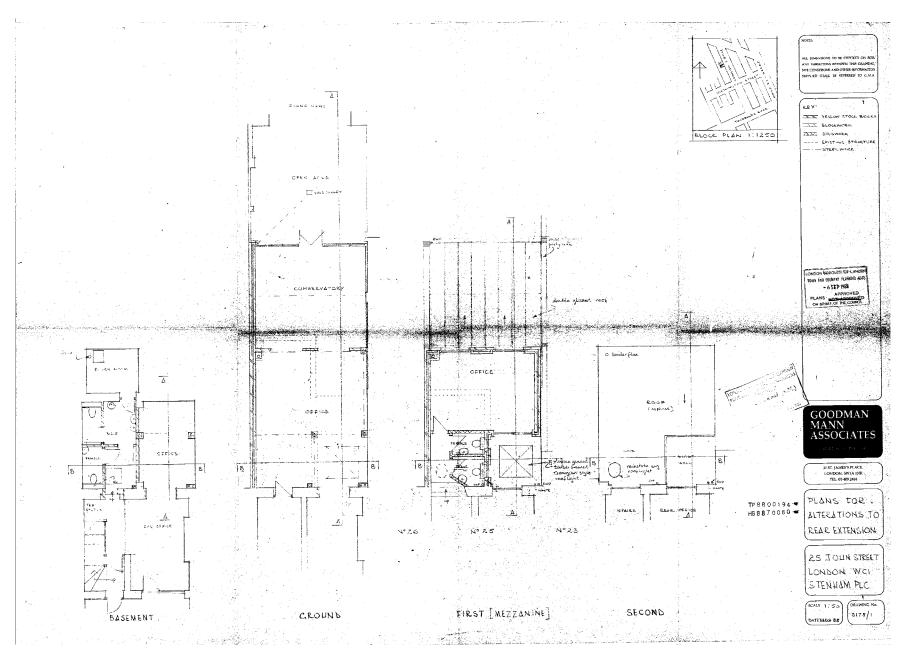
2.14 Interior of rear extension at ground floor, 25 John Street, 1973 (London Metropolitan Archives)

2.2.5 Late-20th and Early-21st Century Development

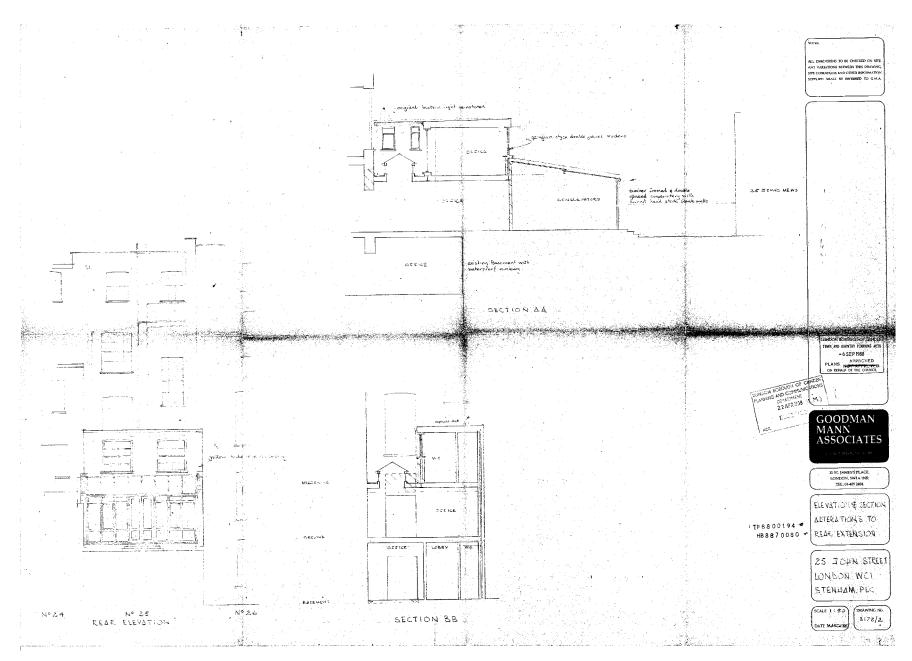
Proposed partial floor plans accompany a 1988 consented planning application to rebuild and enlarge the rear extension of the house and add an additional rear conservatory [plate 2.15]. The basement plan shows that the former wine vault between the front and rear room had been replaced by a modern partition with a single door opening, and that the lightwell to the rear of the northwest corner of the basement was to be infilled by an office extension that also comprised what had been labelled as a rear lobby and WC in 1975 (see plate 2.11). At the ground and first floor levels the extension was open plan and infilled the full width of the plot (replacing the former narrower extension to the south), apart from a small lightwell at first-floor level which included a roof lantern to light the ground floor below. The additional conservatory at groundfloor level was also full width and opened on to an open area at the rear.

An elevation drawing which also accompanied the 1988 application illustrates the new rear elevations at the ground and first floor levels, and also shows that the house's original fenestration was still largely retained in multi-pane sashes at the upper floors [plate 2.16]. Included section drawings show the proposed depth of the rear extension, labelled here as a timber-framed, double-glazed conservatory, as well as the internal arrangement of rooms within the rear wing.

A comparison of the 1975-1988 floor plans with a set of 2014 plans indicates that only minor opening and partition changes occurred at basement level [plate 2.17]. No change was indicated at the ground floor, though rear conservatory had been adapted for use as office space. The modern partitions to the front room at the first floor had been removed as proposed in 1975, and no additional changes were indicated at the second floor. The 2014 plan of the third floor shows that partitions within the front room had also been removed at this level, as well as very minor partition changes to the southwest bathroom. Minor changes have occurred at basement level since 2014, including the insertion of a doorway between the stair hall and front room, the removal of the door between the rear room of the main house and the modern rear extension, and the movement or insertion of partitions within the rear room of the main house and rear extension.



2.15 1988 partial floor plans, 25 John Street (Camden Planning)



2.16 1988 elevation & sections, 25 John Street (Camden Planning)



2.17 2014 existing floor plans

2.3 Planning History

The following summary of relevant planning decisions for 25 John Street has been extracted from the London Borough of Camden's online planning record.

25 John Street

2016/4220/L 06 January 2017 Granted

To insert 12mm toughened glass within the existing opening between the front boardroom and reception at Ground floor level and reinstate timber folding doors to front boardroom (Part retrospective)

8870080 06 September 1988 Granted

The erection of a conservatory at ground floor level with the rebuilding and enlargement of an extension on the basement ground and first floors (forming part of application for a 12-year temporary change of use from garage and rear parking to garage and rear workshop)

HB1243 05 May 1976 Granted

Formation at 25 John Street, WC1 of external boiler room at ground floor level, internal alterations, and works to comply with fire regulations

18027 19 April 1974 Granted

Alterations to the listed building at 25 John Street, WC1 by the reconstruction of a defective vault at the rear of the basement and the re-arrangement of the existing toilet accommodation

2.4 Sources and Bibliography

British Library

Maps Collection

London Metropolitan Archives

GLC Photographs Collection

File reference codes for additional photographs not available at the time of writing include:

SC/PHL/01/160-60

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SC/PHL/01/160-63

SC/PHL/01/160-64

SC/PHL/01/160-65

SC/PHL/01/160-66

Camden Local Studies and Archives Centre

Historic Photographs Lease Records

London Borough of Camden Planning Archives

Building Case Files Redevelopment Drawings

Published Sources

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3.0 Site Survey Descriptions

3.1 The Setting of the Building and the Conservation Area Context

Nos. 25 John Street and 17 John's Mews are located to the northwest of Holborn in the Borough of Camden, within the Bloomsbury Conservation Area, noted for its formal grid of streets interspersed with planned green spaces. The largely Georgian streetscape surrounding No. 25 is the hallmark of this part of London, which is also recognised as the city's academic and intellectual heart. A number of colleges have adapted most of the area's once-residential terraces for educational and institutional use to a manifold result, leading not only to a substantial amount of internal building alteration and increased pedestrian footfall, but also to Bloomsbury's revitalisation as a lively and urban street scene.

3.1.1 The Wider Setting

John Street runs northwest-southeast along the eastern boundary of the Bloomsbury Conservation Area, merging with Dougherty Street to the north and terminating with Theobalds Road to the south. To the east of John Street lies North, King and Brownlow Mews; small-scale streets containing two-to-three storey buildings in stock brick, interspersed with large footprint office blocks of five storeys with glazed curtain walling, which are at odds with the character of these streets.

Beyond the mews, further east of John Street is Gray's Inn Road, a busy commercial street, choked with traffic and for the most part having narrow pavements with buildings of between four-to-eight storeys built hard up against the pavement which creates a hard urban character, though the terraces of Gray's Inn are set back behind high brick walls and the streetscape

is alleviated to some extent in the road's southern section by street trees. The buildings follow a range of styles and are a mixture of stock and red brick, most date from the 19th and 20th centuries, though some 18th century terraced houses survive, and many have ground-floor retail units.

To the south of John Street, the north side of Theobald's Road contains a terrace of Grade II-listed houses of c.1750, restored in 1989. They are four storeys, faced in buff stock brick, though of slightly varying designs – some with stone banding and pedimented porticoes. Further south lie Gray's Inn Gardens (Grade II*), which are surrounded by Grade II-listed terraces and Gray's Inn Square to its southeast (Grade II*).

To the west of John Street and John's Mews, north of the junction with Northington Street lies Saint George the Martyr Primary School, a single storey modern development faced in brick with associated pockets of playground space.

3.1.2 The Immediate Setting

To the west of John Street lies John's Mews, which retains the fundamental character of a mews development; the east side of the street is lined by mostly two-storey buildings with their elevational treatment reflecting their original use with large ground-floor openings and small openings on the upper floors. The street is tarmacked with a small pavement lined with granite kerbs which are historic interest.

John Street, built up from 1756-9 by the carpenter, John Blagrove, retains much of its original Georgian character and is mostly lined with flat fronted late-18th-century and early-19th-century four-storey townhouses with footbridges and basement areas and little adornment except for intricate door casements, some of which have double doors. There is a five-storey brick post-war brick block to the north, which replaced an early-19th-century chapel that experienced bomb damage during the Second World War.

The street is a broad, tree-lined thoroughfare with tarmac covering and parking on both sides. The pavement is unusually wide with flagstone and granite curbs in places, and modern concrete slabs elsewhere. Most buildings have retained their original railings and street signage has been kept to a minimum.

3.2 25 John Street

No. 25 John Street forms part of a Grade II-listed early-19th-century Georgian terrace of seven houses of varying width, which also make a positive contribution to the character and appearance of the Bloomsbury Conservation Area.

3.2.1 Front Elevation

The front elevation is four storeys over a basement **[plate 3.1]**. This original elevation is flat fronted, built of yellow stocks and arranged in two bays with gauged flat-headed arches over window openings. Front entrance located to south and accessed off two original stone steps from pavement, leading to an original recessed square-headed, architraved doorway with a patterned rectangular fanlight and early-19th-century timber panelled double door **[plate 3.2]**. Modern up-light adjacent to doorway, and two early-19th-century timber framed single glazed 6/6 sashes adjacent to the north.

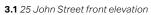
Likely early-20th-century cast iron black painted railings with spearhead finials to lightwell area **[plate 3.3]** with modern timber steps leading to lower ground floor. White painted plain render to the basement façade with original 6/6 timber timber sash window, original central window has been replaced with a late-19th-century 3/3 glass panel timber door with rectangular fanlight. The area underneath the bridge has been infilled and retains a late-19th-century 2/2 timber sash window. Concrete screed finish to lightwell floor, unsightly air-conditioning units and exposed pipework fixed to east wall of lightwell which incorporates timber door to vault.

The first-floor level is visually separated from the ground floor by a string course and it contains two early-19th-century single-glazed 6/6 sashes with late-19th-century cast-iron patterned balconettes to each window. Two mid-20th-century timber framed single glazed 6/6 sashes with late-19th-century cast-iron balconettes to the second floor and 3/3 early-19th-century timber framed single-glazed sashes to the third-floor level. Cast-iron vertical down pipe to north side of fenestration. Original M-plan slate roof concealed behind parapet.

3.2.2 Rear Elevation

The rear elevation has undergone significant alteration in the form of a modern full-width two-storey brick extension and a modern single-storey glazed conservatory extension [plate 3.4]. Upper floors of the main house faced in stock brick with early-19th-century timber framed single glazed multi-pane sashes. When the rear extension was erected, a small lightwell was formed to the rear of the main building at first-floor level [plate 3.5]. Cast iron vertical down pipes to upper floors north of and between fenestration. Brick flue to the south elevation, which runs from second floor to above the parapet, and an incongruous flue visible to southern end of first floor rear extension roof.







3.2 25 John Street front entrace



3.3 25 John Street front lightwell area



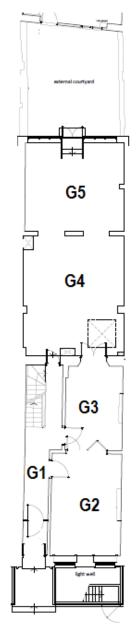


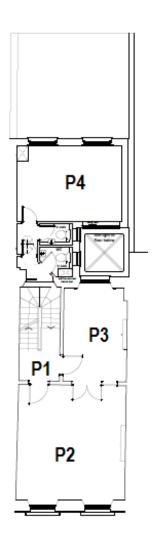


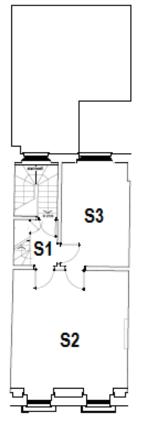
3.5 25 John Street roof of first floor rear extension with lightwell area

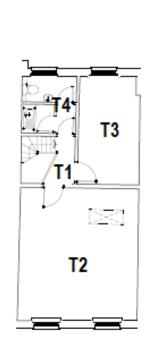
FLOOR PLANS











Basement

Ground Floor

First Floor

Second Floor

Third Floor

3.3 The Building Internally

3.3.1 Basement

B1

Original winder staircase (carpeted) and string leads down from ground floor to the basement corridor **[plate 3.6]**. Modern timber balustrade with plain balusters and a square newel post. Modern handrail to the inner wall. Hallway carpeted with sections of original plain skirting remaining. The corridor would have extended further west but it has been in part amalgamated with the main rear room, and is now separated by a modern glazed door.

B2

Original front room that has been altered with the addition of partition walls forming a lobby area leading from the hallway (L1) and an extension to the main rear room. Doorway opening leading directly from corridor retains original architrave. Original front room plain, carpeted room with modern skirting and modern suspended ceiling with polystyrene tiles incorporating lighting [plate 3.7]. Modern partly glazed timber door with modern architrave leading from lobby. Chimneybreast to north wall but the chimneypiece has been removed and the opening blocked. Single arched opening to east wall leading to the infilled area beneath the entrance bridge. Original timber shutters, architrave and cill to the window. Modern security grilles fitted to the windows and door facing the front lightwell. Modern small cupboard timber door with architrave to south wall, which also has fixed low level trunking and high level fixed timber cupboards. Modern radiator to east wall and air conditioning unit fixed to north wall

B3

Original rear room that has been altered. The wine vault walls separating it from the front room have been removed (an original nib to the north wall remains) and the room has consequently been extended with a modern partition wall with a glazed panel above. However, the room has been reduced in length to the west with the erection of a modern partition wall. Plain, carpeted with modern skirting and modern suspended ceiling with polystyrene tiles incorporating lighting [plate 3.8]. Modern partly glazed timber door leading from the lobby of L2 and glazed panel at the top of the east partition. Chimneybreast to north wall remains but the chimneypiece has been removed and the opening blocked. Modern trunking fitted to several walls.

B4

L-shaped room that occupies a section of the original hallway, the west end of the rear room, and a modern extension at the rear of the house; there is also a small room accessed via a plain timber door at the west end of this space. Modern multi-panelled timber door with over-light leads through from corridor with modern suspended ceiling of polystyrene tiles with spotlights. Rooms contain modern kitchen and utility fixtures and fittings [plate 3.9]. Part of the basement staircase is located in this room, to south elevation, but its balustrade has been replaced by wire-glazed panels. The rear window of the main house, and its associated fabric, has been replaced by a large opening to create this L-shaped space.

B5

Secondary rooms accessed through modern timber six-panelled door with modern architrave. Rooms contain modern bathroom and lavatory fixtures and fittings. Walls are tiled. It is likely that originally this space was a lightwell which ran the full with of the house, which was later infilled.

B6

Original barrel vault to the rear containing services. Rendered walls with concrete floor finish.

B7

Two original barrel vaults to the front. Not inspected at time of survey.



3.6 Lower Ground Floor stair and hallway (L1)



3.7 Lower Ground Floor front room (B2)



3.9 Lower Ground Floor kitchen (B4)



3.8 Lower Ground Floor rear room (B3)

3.3.2 Ground Floor

G1

Original entrance hall leading to principal staircase. 20th-century partially glazed timber door with overlight above subdivides the hallway [plate 3.10]. Carpeted floor with original skirting (along north wall), a dado rail and cornice of classical motifs detailed with rectangular panels of small projections "guttae" to ceiling. Original decorative timber architraves with corner roundels to the two door openings to the front and rear ground floor rooms. Modern boxed radiator to south wall. Stair hallway divided by original decorative corbels that support an arch [plate 3.11]. Hallway dominated by original open-well winder timber staircase with likely original timber stick balusters, continuous timber handrail appears later, which continues to second-floor level [plate 3.12]. Modern chandeliers fixed to ceiling. Modern timber panelled door and architrave to the end of the hallway leading to full-width rear extension. Modern 'Break Glass' fire alarm call point, encased cables and electronic alarm bell appear as visual clutter.

G2

Original principal front room accessed off hallway by timber six-panelled door with original decorative timber architrave with corner roundels. Door appears original but has been altered with a layer of fireproof material and modern ironmongery. Carpeted floor, and tall reeded skirting and dado rail which appear original [plate 3.13]. Original timber architraves with corner roundels and panelled shutters to windows, with modern box radiators beneath. Modern chandelier and replica cornice moulding with ornate floral detailing to ceiling. White marble chimneypiece to

north elevation with reeded jambs and corner roundels and cast iron grate likely early-19th century, although unknown if original to the house as the chimneybreast was removed. Large decorative timber architrave with corner roundels to opening between front and rear rooms with original timber panelled doors (recently refitted to replace a modern glass screen).

G3

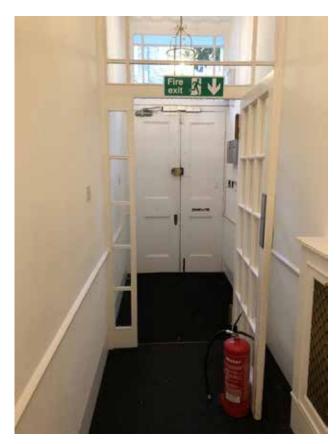
Original rear room accessed off hallway by original timber six-panelled door with original decorative timber architrave with corner roundels. Floor carpeted and tall reeded skirting which appears original [plate 3.14]. Replica cornice with ornate floral detailing to ceiling, fitted around modern corner nib (possibly a riser) to west wall. As per front room, chimneybreast removed and identical likely early-19th century white marble chimneypiece with grate to north elevation. Large decorative timber architrave with corner roundels to opening between front and rear rooms with original timber panelled doors. Double opening to rear west wall leads through to rear extension (G4). This opening was historically a window and retains original timber architrave with corner roundels, and later 20th century timber panel linings and overhead timber panel.

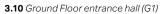
G4

Modern rear full-width extension. Rectilinear open plan room, carpeted and with modern egg-and-dart cornice to ceiling. Large lantern roof-light adjacent to double opening to original rear room (G3). Large openings in the west wall to connect with the conservatory. Two modern air conditioning units fitted to north wall.

G5

Modern rear conservatory extension with monopitched roof. Steps lead down to exterior glazed double doors [plate 3.15].







3.11 Ground Floor entrance hall (G1)



3.12 Ground Floor timber stair and balustrade (G1)







3.14 Ground Floor rear room (G3)



3.15 Ground Floor rear extension (G5)

3.3.3 First Floor

P1

Original stairwell and first-floor landing. Original cornice of classical motifs detailed with rectangular panels of small projections "guttae" to ceiling. Awkward steep step off principal winder staircase to wide opening to connect with rear extension (P4) [plate 3.16]. Original dado rail lines staircase and first-floor landing, continuing up to second-floor level [plate 3.17]. Original decorative timber architrave with corner roundels to the two door openings to the front and rear first floor rooms, and likely original skirting to carpeted landing. Modern chandelier fixed to landing ceiling.

P2

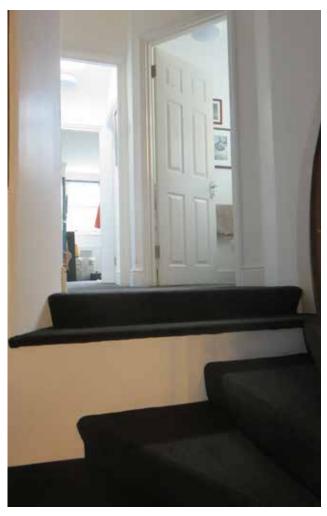
Original principal front room accessed off landing through original timber six-panelled door (modern ironmongery) with likely original decorative timber architrave with corner roundels. Floor carpeted and tall reeded skirting and dado rail which appear original. Original timber architraves with corner roundels, aprons and timber panelled shutters to two sash windows [plate 3.18]. Two modern chandeliers and replica cornice moulding with vine and grape detailing to ceiling. White-marble chimneypiece with vertical ribbed decoration and corner roundels to jambs and entablature with central composition figures and grate, likely early-19th century, although unknown if original to the house as the chimneybreast was removed [plate 3.19]. Original decorative timber architrave with corner roundels to double opening to rear room with original timber panelled folding doors.

Р3

Original rear room, accessed off landing through original timber six-panelled door (modern ironmongery) with likely original decorative timber architrave with corner roundels. Floor carpeted and tall reeded skirting which appears original. Original timber architrave with corner roundels, apron and timber panelled shutters to sash window. Modern chandelier and replica cornice moulding with vine and grape detailing to ceiling [plate 3.20]. Possibly early-19th-century (or a later replica) white-marble chimneypiece with ribbed decoration and corner roundels to jambs and entablature to north elevation, chimneybreast removed.

P4

Modern rear full-width extension, apart from a small lightwell to the rear of the main house. Two modern lavatories to the half-landing with modern timber panelled doors and architraves. Modern timber six-panelled entrance doors and architraves, floor carpeted, with modern skirting and modern egg-and-dart cornice to ceiling. Two modern timber 8/8 timber sash windows to west elevation and aluminium framed sliding glass doors to east elevation providing access to the first-floor lightwell.

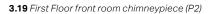


3.16 Steps to half-landing of principal staircase (P1)











3.20 First Floor rear room (P3)

3.17 First Floor stair landing (P1)

3.3.4 Second Floor

S1

Original timber sash window at half-landing level with original reeded architrave. Principal staircase ends at second-floor level, stair landing carpeted and modern timber six-panelled door with modern timber architrave within what was historically an arched opening leading to landing [plate 3.21]. Floral cornice to ceiling above principal staircase, likely original. Second floor landing carpeted with original skirting. Secondary staircase to third floor with original timber balustrade and handrail [plate 2.32]. Timber cupboard door beneath secondary staircase, likely original.

S2

Original front room, accessed off landing through original timber four-panelled door (modern ironmongery) with and original simple timber architrave. Floor carpeted and modern skirting and dado rail. Moulded cornice to ceiling appears original. Original timber architraves and timber panelled shutters to windows, with modern radiators beneath [plate 3.23]. Fixed modern timber cabinets either side of and between fenestration. Modern timber chimneypiece on raised hearth with swag detail to entablature to north elevation, chimneybreast removed. Original timber four-panelled door (modern ironmongery) with original simple timber architrave to west elevation leading through to rear room (S3).

S3

Rear room, accessed off landing and front room through two original timber four-panelled doors (modern ironmongery) with simple original timber architraves. Floor carpeted, skirting appears modern. Original plain timber architrave to sash window, with modern radiator beneath. Modern coved cornice to ceiling.



3.21 Second Floor half-landing (S1)



3.22 Second Floor landing and secondary staircase to third floor (S1)



3.23 Second Floor front room (S2)

3.3.5 Third Floor

T1

Secondary staircase to third floor with timber balustrade with stick balusters and handrail which appears original **[plate 3.24]**. Skirting to landing appears original. Modern radiator to north wall. Modern downlight to ceiling adjacent to ceiling hatch providing access to attic.

T2

Original front room accessed off landing through original timber four-panelled door (modern ironmongery) with original simple timber architrave. Floor carpeted and modern skirting and dado rail. Modern egg-and-dart cornice to ceiling. Original plain timber architraves to windows, with modern box radiators beneath [plate 3.25]. Modern small chandeliers fixed to ceiling and modern double rooflight visible through ceiling void.

Т3

Original northwest rear room accessed off landing through original timber four-panelled door (modern ironmongery) with original simple timber architrave. Floor carpeted and modern skirting. Original plain timber architrave and apron to window. Modern eggand-dart cornice to ceiling.

T4

Door and architrave from landing appear original (modern ironmongery to door). Original southwest rear room, subdivided with modern partitions walls with modern timber panelled doors and architraves to form a separate tea point and WC, modern vinyl flooring to both partitioned rooms and modern skirting. Original plain timber architrave and apron to window.



3.24 Secondary staircase to third floor



3.25 Third Floor front room (T2)

4.0 Assessment of Significance

4.1 Introduction

The purpose of this section is to provide an assessment of significance of 25 John Street so that the proposals for change to the building is fully informed as to its significance and so that the effect of the proposals on that significance can be evaluated. The assessment begins with a general summary of the building's history and significance; then the various elements of the building is assessed according to a sliding scale of significance, reflecting the extent to which they contribute to the listed building's special architectural and historical.

This assessment responds to the requirement of the National Planning Policy Framework to 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. The NPPF defines significance as;

'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.

4.2 Significance

4.2.1 The Bloomsbury Conservation Area

The Bloomsbury Conservation Area is largely defined by the formal grid pattern of residential streets and garden squares that was laid out from the late-17th to the 19th century, although the area has undergone quite substantial change since the 19th century with the expansion of hospital, institutional, academic and cultural uses. No. 25 John Street is a typical and significant example of the area's original residential development, representing the early/mid-19th-century phase, with its largely unaltered brick façade which contributes positively to the character and appearance of the conservation area.

4.2.2 25 John Street

No. 25 John Street is of special interest as an example of an early-19th-century townhouse. Its principal significance lies in its external appearance and its contribution to the listed terrace, the wider street scene and the conservation area; elements of particular note are the building's façade proportions, the composition and hierarchy of the window openings and its original double pitched roof.

The interior plan form has been largely preserved and is of significance, particularly on the principal floors, apart from the basement which has been considerably altered. The original hierarchy of floor levels (and their different status) is still evident in terms of the varied storey heights and some of the surviving decorative features. The principal timber staircase is of high significance, as are some early-19th-century features, where they remain, including chimneypieces,

decorative architraves and doors, skirtings, dado rails, sash windows and associated fabric, and some original cornices.

This special interest is manifest in the fabric and plan form of the building, which has the following hierarchy of significance.

Of the highest significance are:

 The original front elevation and double pitched roof;

Of high significance are:

- The rear elevation of the original house, although the full-width ground and first-floor extensions are of no significance;
- Original principal staircase between ground and second floors.
- The largely unaltered original plan form for the ground-to-third floor levels;
- The original vaults to the front and rear;
- The original secondary staircase from secondto-third floor;
- Original/19th-century decorative features and joinery, where they remain, including chimneypieces, cornices, doors, window and door architraves, window aprons, skirtings dado rails etc. (see Section 3 for full details).

Of moderate significance are:

- Late-19th/early-20th-century front boundary cast iron railings and Juliet balconies at first and second floors;
- The original basement staircase with its modern handrail;

Of limited significance is:

 The basement plan form which has undergone substantial alteration, with only fragments of the original layout remaining;

Of neutral significance, neither contributing to nor **detracting** from the significance of the whole are:

- 20th-century/modern fixtures and fittings, such as doors, cornices, skirtings and chimneypieces, some of which contribute to a sense of character but which are of no interest in terms of their fabric;
- Modern lavatories and bathrooms;
- Modern two-storey brick extension to the rear.
- Modern conservatory to the rear.

Factors which detract from the building's significance are:

- The infilling of the area beneath the entrance bridge and the conversion of a lightwell window to a door;
- The untidy downpipes and historic brick flue to the rear elevation:
- The visible flue above the rear extension:
- Trunking and tiled suspended ceilings in various rooms at basement level:
- The wire-glazed screen that partially replaces the balustrade of the basement staircase;
- The loss of the chimneybreasts on the ground to third floors:
- The glazed door and overlight that subdivide the entrance hall:
- The awkward arrangement of steps leading from the ground-to-first-floor half-landing level.

5.0 Commentary on the Proposals

5.1 Description of the Proposals and their Impact on the Listed Building

The proposals are set out in the drawings and Design & Access Statement prepared by Donald Insall Associates, which this Historic Building Report accompanies. The proposals are minor in nature and relate to the proposed change of use from an office to a residential dwelling. The proposals are described below, with the impact on the listed building set out in italics.

5.1.1 Basement

At basement level, it is proposed to remove modern fixtures and fittings including: the modern suspended ceiling; AC units, consumer units, and other meters and associated cabling at high level; modern cabinets and kitchen fixtures. It is also proposed to remove the modern partition walls and associated modern doors, which form the lobby area off the hallway (B1), the modern partition wall between the front and rear room (B2 & B3), and the modern west partition wall of the rear room (B3). A new partition wall with double doors would be installed between the front and rear rooms in the original location aligned with an original nib. A further partition wall would be installed to the hallway to form the southern wall of the rear room, again in its likely original location, and a partition wall would be reinstated between the existing scullery and kitchen. New timber panelled fire doors would replace the existing modern hallway doors. Traditionally designed timber shutters would be installed to the door opening to the lightwell, to match the historic shutters on the adjacent window opening. Externally, the modern timber stairs to the lightwell would be replaced with traditionally designed metal service stairs.

The proposed internal and external alterations to the basement would cause no harm to the special interest of the listed building and conservation area, and in most instances would enhance the building's significance. The removal of modern partitions and the reinstatement of an element of the original floor plan would be considered a heritage benefit. As would the removal of the modern suspended ceiling, which would reinstate the original floor to ceiling height, and see the incongruous cables and services within the ceiling void rationalised, with all redundant cables removed. The installation of traditionally designed shutters to the lighwell door opening would again enhance the building's significance. The replacement of modern doors with timber panelled fire doors would again cause no harm to the building's significance and also meet the necessary requirements of Part B of the building regulations. The existing timber stair to the lightwell is of no architectural or historic merit, and its replacement with a traditionally designed metal stair would be a modest benefit that would enhance both the significance of the listed building and the Bloomsbury Conservation Area.

5.1.2 Ground Floor

At ground floor, it is proposed to remove modern fixtures and fittings including; modern service risers, electric trunking, office fire alarm, and potable water supply pipe; modern radiators and their casings; and the modern pendant lighting in the front room (G2). It is also proposed to remove the modern tubular handrail from the rear conservatory (G5), and the 20th-century partially glazed timber door and overlight, which subdivides the hallway (G1). It is proposed to install a new central pendant light to the modern front room ceiling. New lightweight cabinets would be installed within the modern full-width extension (G4), which would be detailed with timber panelling. The historic timber floorboards beneath the modern carpet of the front and rear rooms would be made good, and any damaged floorboards would be replaced to match the existing.

The proposed ground floor alterations would cause no harm to the special interest of the listed building. All fabric to be removed is modern and of no architectural or historic interest. The proposals have been carefully considered and all installations would be fixed to modern fabric and designed to complement the historic character of the interior.

5.1.3 First Floor

At first floor, it is proposed to remove modern fixtures and fittings including: the modern service riser, electric trunking and potable water supply pipes; the modern lightweight partition walls and doors and sanitary fittings which form the WCs in the rear extension (P4); and the modern pendant light to the front room (P2). As per the first floor, the historic timber floorboards

beneath the modern carpet of the rear room would be made good, and any damaged floorboards would be replaced to match the existing. New partitions and doors would be installed within the modern extension to create a reconfigured WC and shower room with new sanitary fittings and floor finish, and a new central pendant light would be installed to the front room.

As per the ground floor, the proposed first floor alterations would cause no harm to the special interest of the listed building. All fabric to be removed is modern and of no architectural or historic interest. The proposals have been carefully considered and all installations would be fixed to modern fabric and designed to complement the historic character of the interior.

5.1.4 Second Floor

At second floor level, it is proposed to remove modern fixtures and fittings including: modern radiators and their casings; and modern electric trunking and potable water supply pipe. The modern carpet and fittings would be replaced, and the modern chimneypieces and hearth to the north wall of the front room (S2) would be replaced with a new chimneypiece of traditional design. It is also proposed to remove the modern door and architrave within the arched opening off the staircase into the landing. New traditionally designed radiators would be fitted beneath the windows to the front room. The rear room (S3) would be sub-divided with a new partition wall and door to create a bathroom and dressing area, with new sanitary fittings and built-in-cabinets installed. Where missing or damaged, the existing cornice and skirting would be restored to match the adjacent.

The proposed second floor alterations would cause no harm to the special interest of the listed building. All fabric to be removed is of no architectural or historic interest, including the chimneypiece in the front room, which is of modern construction and an overly ornate design for second floor level. Its replacement with a more authentic, Regency design would be considered a heritage benefit. The proposed subdivision of the rear room is considered to cause no harm to the building's significance. The second floor is of lesser significance than the principal ground and first floors, and the proposed rear room would retain a rectilinear layout whilst enabling the installation of a bathroom and storage at second floor level. The provision of these facilities would also support the long-term viable use of the building in residential use, which is the optimum viable use of the building. The restoration of skirting and cornicing to this room would be a further heritage benefit at this level.

5.1.5 Third Floor

At third floor level, it is proposed to remove modern fixtures and fittings including: modern radiators and their casings; the modern service riser; and modern electric trunking and potable water supply pipe. The modern partitions forming a WC in the southwest rear room (T4) would be removed to create a single bathroom. A new timber panelled door and architrave opening would be created between the two rear rooms to enable en-suite access. New lightweight partitions would be installed to the western side of the front room (T2) to create a small bathroom with new sanitary fittings and walk-in-wardrobe. It is also proposed to install slim-line secondary glazing to the front windows.

The proposed third floor alterations would cause no harm to the special interest of the listed building. All fabric to be removed is of no architectural or historic interest. A new door opening between to two rear rooms would result in the removal of some historic structural wall fabric, however at third floor level, this fabric is not considered to be of special interest to the listed building, and the proposed door opening would be appropriately detailed and would have no impact upon the floor plan or legibility of these two rear rooms. The proposed partitions in the front room to create a bathroom and walk-in-wardrobe would follow the footprint of the previous kitchen at this level, as demonstrated by the 1975 plans (plate 2.11). Similar to the second floor, the third floor is of lesser significance than the principal ground and first floors, and the proposed partitions would not impact upon the rectilinear layout of the front room. The provision of these facilities would also support the long-term viable use of the building in residential use, which is the optimum viable use of the building. Furthermore, the original form of the rear room would be reinstated as part of these works. The proposed installation of secondary glazing would be a discreet addition, which would enable the retention of the historic windows and preserve the significance of the building.

5.2 Justification of the Proposals and Conclusion

No. 25 John Street is an early-19th-century, Grade II-listed building that makes a positive contribution to the character and appearance of the Bloomsbury Conservation Area. The significance of the building is primarily derived from its external appearance and its contribution to the listed terrace, the wider street scene; elements of particular note are the building's facade proportions, the composition and hierarchy of the window openings and its original double pitched roof. The interior plan form has been largely preserved and is of significance, particularly on the principal ground and first floors. All floors, however, have seen modern intervention associated with the buildings use as an office, which has been of detriment to the building's special interest. The proposals are minor in nature, and would see the removal of modern fabric in association with the proposed change of use from an office to a residential dwelling. Where possible, original plan form would be reinstated, while minor plan form changes are proposed to support the long-term use of the building in residential use, the optimum viable use of the building. Appropriate traditional fixtures and fittings would also be reinstated.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their setting and conservation areas, and to have special regard to the desirability of preserving

the special architectural or historic interest of listed buildings and preserving or enhancing the character or appearance of a conservation area.

The National Planning Policy Framework (NPPF 2021) has crystallised previous policy approaches to the historic environment. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development and it emphasises the need to take account of the pros and cons of any proposal to alter and adapt buildings of 'special' architectural and historical interest.

For the reasons outlined above, it is considered that the proposals would preserve the special interest of the Grade II-listed building and preserve the character and appearance of the Bloomsbury Conservation Area. As the proposals would not cause any harm to the significance of any of the relevant designated heritage assets paragraphs 201 and 202 of the NPPF, relating to the assessment of harm to heritage assets, are not engaged.

Therefore the proposals comply with the relevant policies of the National Planning Policy Framework, including the requirement in paragraph 189 to conserve heritage assets 'in a manner appropriate to their significance', and with relevant local policies in heritage terms including specifically policies D1 and D2 of the Camden Local Plan (2017) and Policy HC1 of the London Plan, and are, therefore, considered to be acceptable in heritage terms.

Appendix I - Statutory List Description

25 John Street Grade II

List Entry Number: 1379157

Date first listed: 24 October 1951

NUMBERS 22 TO 28 AND ATTACHED RAILINGS, 22-28. JOHN STREET

TQ3082SE JOHN STREET 798-1/96/944 (West side) 24/10/51 Nos.22-28 (Consecutive) and attached railings GV II

Terrace of 7 houses, c1800-19. Yellow and multicoloured stock brick with stucco bands at 1st floor levels. Nos 27 & 28 with slated mansard roofs and dormers. 4 storeys and basements; Nos 27 & 28 with attics. 2 windows each; Nos 26 & 27, 3 windows each; No.28 double fronted with 5 windows. Gauged brick flat arches to recessed sashes, most with glazing bars; 1st floors with cast-iron balconies, except No.28. Parapets. No.22: square-headed, architraved doorway with patterned rectangular fanlight and panelled door. INTERIOR: noted to retain reeded marble fireplaces on ground and 1st floors. Stairs with square balusters. No.23: similar doorway to No.22. INTERIOR: noted to retain reeded marble fireplaces on 1st and 2nd floors (original centres covered in). No.24: similar doorway to No.22. INTERIOR: noted to retain marble fireplaces with original centres on ground floor. No.25: similar doorway to No.22. INTERIOR: noted to retain marble fireplaces on ground floor. Good marble fireplace 1st

floor front room with bas relief on front panel, reeded and with rosettes; original iron centre. Nos 26 & 27: round-arched doorways with reeded doorframes, lion mask stops, mutule cornice-heads, patterned radial fanlights and panelled doors. No.27 with lampholder incorporated in fanlight. No.26 with fluted lead rainwater head. No.28: round-arched doorway with attached Doric columns carrying entablature; patterned radial fanlight and panelled door. Cornice and blocking course. Wrought-iron overthrow lampholder. Return to Northington Street with 1 window and mid C19 entrance with stucco surround and consolebracketed cornice. Dentilled cornices. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas.

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

[...] 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.

Similarly, section 66 of the above Act states that:

In considering whether to grant permission for development which affects 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.

Similarly, section 72(I) of the above Act states that:

[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Local Policy

Camden Local Plan (June 2017)

The local plan was adopted by the Council on 3 July and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

Policy D1 Design

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- I. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Excellence in design

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under "Policy G1 Delivery and location of growth" will be provided through high quality contextual design.

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

Designed 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.

Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a nondesignated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

The following relevant information was extracted from the Bloomsbury Conservation Area Appraisal and Management Strategy, adopted in 2011.

Sub Area 10: Great James Street/Bedford Row

5.174 The Great James Street and Bedford Row sub area was developed during the Georgian and Regency periods under various ownerships, although part of the street pattern was laid out earlier by Nicholas Barbon. The area has a clear street hierarchy structured on a grid layout. Bedford Row, Doughty Street and John Street are wide thoroughfares characterised by larger properties. There is a progression in scale (and grandeur) from Millman Street, through Great James Street to Bedford Row. There is no planned open space in the sub area, although the more formal streets are characterised by regularly spaced street trees, planted at regular intervals in the pavement.

5.175 The historic built form comprises townhouses built in long terraces with rear mews. This fine grain remains an important characteristic and the continuous building frontage created by the terraces creates a strong sense of enclosure.

5.178 Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares (John Street, Doughty Street, Bedford Row, Rugby Street and Great James Street) are dominated by office uses but retain some residential uses (in particular in Millman Street). Throughout

the sub area, there is an increasing trend to return townhouses to their original use as single family dwellings. The larger properties in Bedford Row are largely occupied by legal firms, due to their proximity to Gray's Inn and Lincoln's Inn. The mews tend to have a mixture of residential uses and small workshops including garages, printers and refuse collectors. Towards the eastern and western edges of the sub area, more retail uses can be found in streets closest to Gray's Inn Road and Lamb's Conduit Street, such as in Rugby Street and Guilford Street.

5.179 The main streets include John Street which leads into Doughty Street and the stretch of Bedford Row running north to south, as well as the western part of Guilford Street and the west side of Gray's Inn Road south of Guilford Street which lie in the sub area. Most of the buildings on these streets are listed, reflecting the high quality of the built environment. The streets are wide and grand, comprising mainly three- and four-storey Georgian terraced houses. A number of the corner plots were refaced in the 19th century and these alterations provide greater architectural emphasis on the street junctions.

5.182 The townhouses along John Street, Doughty Street and Guilford Street are of significance as they are almost complete Georgian streets, lined with terraces. John Street dates from the mid 18th century, whilst Doughty Street and Guilford Street span the late 18th century to the early 19th century. Although later in date, the townhouses are similar in plan form to those in Bedford Row, but are of a smaller scale and footprint. They are constructed from yellow stock brick, the earlier examples with red brick trim and the later

examples with stucco detail...Buildings on John Street are generally of four storeys with basements, some are stuccoed at ground floor and some have mansard roofs with dormer windows. A number of townhouses are of particular architectural significance and are thus listed grade II*.

5.190 Whilst pressure for change has led to many of the original mews buildings being replaced, Doughty Mews and the northern end of Brownlow Mews arguably contain the best surviving examples of original mews buildings although many have been altered...Cockpit Yard, named after a fashionable 18th century cockfighting venue, together with John's Mews, has a greater number of recent interventions, although their fundamental character is retained; it is home to the Cockpits Arts organisation. North Mews has been entirely redeveloped, and much of the southern stretch of Kings Mews has been rebuilt.

Control over New Development

5.32 The appearance of all buildings of historic interest (listed and unlisted) within the Conservation Area is harmed by the removal or loss of original architectural features and the use of inappropriate materials. For example, the loss of original joinery, sash windows, porches and front doors, can have considerable negative impact on the appearance of a historic building and the area. Insensitive re-pointing, painting or inappropriate render will harm the appearance and the long-term durability of historic brickwork.

5.33 In all cases the Council will expect original architectural features and detailing to be retained, repaired, protected, or refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair.

Regional Policy

In March 2021, the Mayor published (i.e. adopted) the London Plan. This is operative as the Mayor's spatial development strategy and forms part of the development plan for Greater London. Policies pertaining to heritage include the following:

Policy HC1 Heritage Conservation and Growth (C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (July 2021). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals

relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'. At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with

accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of the NPPF identifies the following criteria in relation to this:

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

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

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 199 the framework states the following:

economic vitality; and

...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.

The Framework goes on to state at paragraph 200 that:

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.

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 201 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total 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; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, 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

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

202. 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.

In terms of non-designated heritage assets, the NPPF states:

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and world heritage sites and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 206 states that:

... Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 207, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on the 23rd July 2019 to support the National Planning Policy Framework (NPPF) 2021 and the planning system. It includes particular guidance on

matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and

thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in

close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs193-196 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For 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.

While the impact of total destruction is obvious, 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, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 194).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and 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 benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Other Relevant Policy Documents

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

Historic England: Conservation Principles and Assessment (2008)

