



8 December 2021

2021/1905/P

London Borough of Camden
5 Pancras Square
London
N1C 4AG

Formal objection to 2021/1905/P replacement and enlargement of rear window at 288 Gray's Inn Road, WC1X 8EB

Following further discussion and investigation by the committee into the revised proposal we will keep our objection standing on the basis of causing unacceptable damage to the fabric of a historic building and being detrimental to the significance of the Bloomsbury Conservation Area.

Planning History

Our investigations into the planning history of 288 Gray's Inn Road are in line with the Conservation Officers statement that 'the building dates from the Georgian Period'.

The building is mostly original Georgian fabric constructed as part of the Calthorpe Estate c.1840, these buildings were then acquired by LB Camden in 1976 as part of a wider acquisition of Georgian properties in the area at that time. In 1982 282 to 288 Gray's Inn Road were sold to a private owner; at this time, they were derelict with shopfronts on all ground floors. This can be seen in a photograph from 1975 in the Metropolitan Archives showing the facades painted and the installed shopfronts. In 1982 an appeal was allowed (L15/24/A/35303(R1)) for substantial renovation of these properties, including the replacement of all shopfronts with a new rusticated frontage and railings, explaining their slightly unusual appearance on the ground floor. In 1985 a Mansard level was added to each building (8500090).

From looking at photos of the rear of 286 and 288 Gray's Inn Road we believe that the applicant's window is original Georgian fabric characterised by the brick arch lintel. This is also apparent in the larger first floor rear windows in 282 to 286 Gray's Inn Road as highlighted by the applicant. There is no precedence for replacing and enlarging original Georgian first-floor rear windows on said terraces. We also noticed that the smaller rear windows on 282 to 288 are not original and have been added in the last century, probably in the 1985 renovation or illegally. These windows are not a precedent for modern alteration.

These alterations explain why some elements of the property appear modern. The fabric of the building remains original Georgian, including parts of the rear elevations which are clearly original

Georgian fabric. Had sufficient photos and a heritage statement been submitted in respect of this application, these details would have been clearly set out avoiding any points of confusion. As required by paragraph 194 of the NPPF *'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected'*.

Heritage Significance

The development of Bloomsbury followed a set historical pattern. Landowners would lease plots of land to builders with approved elevations of houses included in the associated deeds. So long as builders conformed to that elevation, they had the choice of building what they liked in plan, section, and upon the rear elevation. The variation in rear elevations shown by the applicant is not because of recent alterations, nor likely alterations whatsoever. Alterations to window openings would require planning permission, and there are no planning records for alterations to said windows. Therefore, there is no planning precedent for altering these windows whatsoever.

The variation in rear elevations is likely due to individual builders or a single builder varying their plans and elevations at each separate plot. In other words, the variation is likely original to the Georgian terraces. This would have been established by any heritage report had one been supplied. No evidence has been submitted by the applicant in respect of the window itself regarding whether it is historic Victorian or Georgian or even original fabric. If historic there is a clear presumption against replacement of the window itself, never mind alteration to the window opening as well.

Alterations to the window opening would result in the loss of the original brick arch and loss of the fine original Flemish bond brickwork and painted lime rendered reveal around the window opening. The replacement is apparently a flat, possibly concrete lintel. In our view, this is totally unacceptable, especially given the very small benefit gained through a marginally increased window opening. The works would require invasive temporary structural works to replace the brick arch causing further harm to the building.

Relevant Planning Policy

Paragraph 5.32 of the Bloomsbury CA Management Strategy states: *'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.'*

Paragraph 5.33 of the Bloomsbury CA Management Strategy states: *'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.'*

As there is no damage to the aforementioned original features, the proposal should be considered inconsistent with the statutory duty to preserve and enhance the special interest of the Bloomsbury CA, and the duty under the NPPF paragraph 201 it is to balance less than substantial harm against public benefit. This application and any application proposing alterations to the window should,

therefore, be refused. Any future applications should rigorously justify alteration to historic fabric by means of a heritage report written by a suitably qualified professional.

Conclusion

It is in our view that the building is of high historic and architectural significance and alterations to the historic fabric through the removal of original brickwork and window, should not be approved. There is no precedent for alteration to window openings on this terrace and approval would set a very poor precedent for future alterations to unlisted buildings throughout the Bloomsbury CA.

Bloomsbury Conservation Areas

Advisory Committee