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2021/5128/P 2021/5707/L

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Formal Objection to application 2021/5128/P and 2021/5707/L regarding works to 5 Denmark Street, including replacement of windows, roof extension, and associated alterations.

The Denmark Street CAAC formally objects to this application on the basis of harm caused to the Grade II listed building through loss of historic and architectural significance, and subsequent harm caused to the Denmark Street Conservation Area. The grounds of our objection are set out below.

## Denmark Street Façade Alterations

The application proposes to lower the sill of the window openings at first floor to below the fascia level, and to replace all windows with two-over-two sash windows with exposed sash boxes. There also appear to be alterations to the shopfront, although these are not explained in the application or drawn in detail.

Alterations to a listed building necessarily involve loss of historic fabric and should therefore be convincingly justified in terms of conservation or other material considerations and local plan policies. In considering whether alterations to the façade of a listed building impact upon significance, evidence should be presented as to the features and fabric of the façade which are original or form part of its historic development. Alterations should not harm any elements of the façade which contribute towards significance ('preservation'), or should aim to restore some previous or original appearance or detailing of the façade ('restoration').

In this case, it is clear that the façade has undergone some level of change throughout its history. Originally constructed c.1680, it is stated in the supplied heritage statement (2.24) that between 1908 and 1938, the three storey building was extended upwards to provide an extra storey. The alterations are therefore themselves of some historic and architectural interest as dating from the Edwardian era. The report further states that it is 'plausible' that the entire façade was reconstructed at this time, although no evidence is actually supplied in support of this. From visual observation, there is a clear difference in the brickwork between the development site and neighbouring number 5 and 4, but there is also a clear difference in brickwork between the fourth storey extension and the rest of the building. On the balance of probabilities, the façade has undergone some level of reconstruction throughout its history, but in our view, no clear conclusions can be drawn as to the construction date(s) of the façade, other than that they certainly predate 1938 and may be as old as 1680.

It is furthermore not established whether, if the façade indeed is a replacement, to what extent the façade is a facsimile of the original façade.

Given that the façade is historic, the proposed alterations to the window openings are considered to represent a loss of historic fabric and detailing. Given the evidence presented as part of the application, there is no reason to believe that the windows openings at first floor do not represent the original design of the 1680 façade.

There is the further important point that the ground floor façade benefits from a shopfront which retains at least some historic detailing and fabric. While the existing fascia board, stall riser, and glazing are modern, there are historic columns and a cornice retained which are clearly visible. Removal of the fascia board may reveal an historic timber fascia behind. The existing window sill rests upon the top of the historic cornice, meaning that lowering of the sill would necessitate demolition of the cornice and subsequent loss of the significance of this historic shopfront.





Cornice detail visible

The drawings are unclear but appear to propose simply 'building down' in brick to replace this area of shopfront, while retaining the rest of the shopfront below and allowing the columns to rise to the previous level. This is in our view, poor design, and would erode the architectural and historic significance of the building and lead to a loss of historic shopfront detailing.



It is our view that in general, alterations to the façade of a listed building should be strongly resisted unless convincing justification can be supplied in their support. The only justification supplied as part of this application is that the façade shall be 'rationalised'. It is inappropriate to make fundamental alterations to a listed building simply to 'rationalise' their appearance. Permitting such alterations would set a dangerous precedent, both in this CA and in the wider area. For these reasons, we object to these elements of the proposal, and consider it contrary to policies D1, D2, and D3.

## Denmark Street Window Replacements

The existing windows are clearly not original to the building, and we agree with the applicant that the non-matching windows between floors is harmful to the significance of the building. The heritage statement however asserts that the windows are modern, which is highly unlikely. The image supplied as part of the heritage statement and found as part of record number 70713 of the London Picture Archive shows what appears to be the same windows in place in 1953. From observation, the windows (apart from the top floor) appear to be Victorian, while the top floor windows appear contemporary with the early c20 extension. Nevertheless, the existing windows are historic fabric, with their replacement therefore considered generally unacceptable (para 11.1 of the Denmark Street Conservation Area Management Strategy).

Replacement with sash windows aiming to restore the historic appearance of the terrace would clearly be considered positive in conservation terms and we would consider it to outweigh the loss of historic fabric. However, no evidence is supplied as to whether the proposed replacements do indeed restore the original appearance of the building. Neighbouring properties, including those worked on by the instructed architect, have used a six-over-six configuration which is far more acceptable than a two-over-two configuration. Figure 9 of the heritage statement also shows a drawing of original timber casement windows, the restoration of which would be considered a strong heritage benefit as being an extremely unusual historic detail. The restoration of these windows would act to enhance the understanding of this street as pre-Georgian in origin if researched and carried out correctly.



1951 photograph of 5 Denmark Street

In summary, we must therefore also object to the replacement of windows in their current form, although appropriate replacements would be supported evidenced by historic research.

Alterations at Rear

Alterations at the rear are withheld pending a potential site visit.

Bloomsbury Conservation Areas *Advisory Committee*